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Timber Management Environmental Impact Statement

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
District Office
1717 Fabry Road S.E.
P. O. Box 3227
Salem, Oregon 97302

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Enclosed for your review and comment is the Westside Salem Timber Management Final Environmental Impact Statement (FEIS). This FEIS is a short-form final consisting of the comments and responses to the draft EIS and text revisions for the necessary changes. In order to fully understand the FEIS it must be used in conjunction with the earlier draft statement which was distributed to the public on July 9, 1981. This procedure has saved substantial time and money.

An environmental impact statement is not the decision document. Comments on the FEIS will be taken into consideration in development of the decision. Your comments should be submitted to the District Manager by the end of January, 1982. Letters should be addressed to:

District Manager (Attn: Planning Coord)
Bureau of Land Management
1717 Fabry Road S.E.
Salem, Oregon 97302

Work will start shortly on a draft decision document based on the analysis contained in the EIS, any additional data, public opinion, management feasibility, policy and legal constraints. The proposed decision may be to select one of the EIS alternatives (including the proposed action) intact, or to blend features from several alternatives that fall within the range of actions analyzed in the EIS.

Following release of the draft decision document, a 45-day comment period will be provided and a public meeting will be held prior to making the final decision.

Thank you for your interest in the Westside Salem planning, environmental analysis and decision process.

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Joseph Alone

District Manager

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DEPARTMENT OF THE INTERIOR

FINAL

ENVIRONMENTAL IMPACT STATEMENT

WESTSIDE SALEM SUSTAINED YIELD UNITS
TEN-YEAR TIMBER MANAGEMENT PLAN

Prepared by

BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR

State Director, Oregon State Office

Bureau of Land Management
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Denver Service Center

WESTSIDE SALEM PROPOSED TIMBER MANAGEMENT

Draft ( ) Final (x) Environmental Impact Statement

Department of the Interior, Bureau of Land Management

1. Type of Action: Administrative (x) Legislative ( )

2. Abstract: This EIS describes and analyzes the environmental impacts of implementing an updated 10-year timber management plan for the 244,059 acres of public land in the Columbia and Alsea-Rickreall Sustained Yield Units on the westside of the Salem District, Oregon. The Bureau of Land Management is responsible for managing timber on public lands under the principle of sustained yield consistent with the protection of other resources. Eleven alternatives including a proposed action are described and analyzed for environmental impacts. The proposed action, the result of Bureau multiple use planning using public input, is the preferred alternative. Other alternatives analyzed include: 1) maximum timber production, 2) strong emphasis on timber production, 3) emphasis on timber production, 4) emphasis on non-timber values, 5) strong emphasis on wildlife and other non-timber values, 6) lower average minimum harvest size, 7) higher average minimum harvest size, 8) no control of competing vegetation with herbicides, 9) no allowable cut effect and 10) no action. Specific timber management components of the proposed action and alternatives include road construction, timber harvest, site preparation, reforestation, plantation protection, precommerical thinning, fertilization, and control of competing vegetation. Environmental impacts of the proposed action include wildlife habitat modification, reduced timber harvest, altered stream flow, and reduced soil erosion and stream sedimentation.

3. The draft statement was filed with EPA and made available to the public on July 9, 1981.

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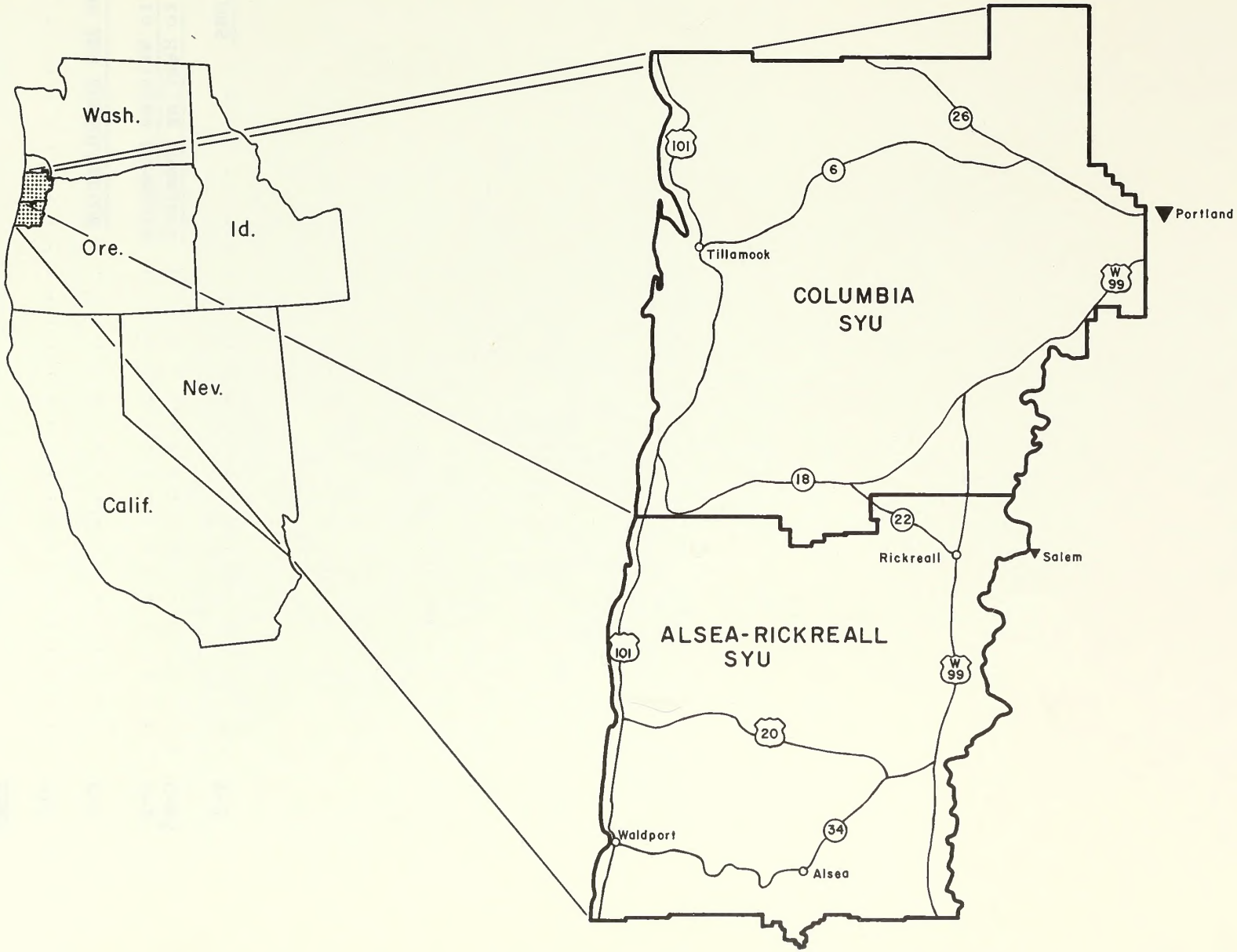
VICINITY MAP

WESTSIDE SALEM SYUS



SUMMARY

Introduction

This environmental impact statement (EIS) describes and analyzes the environmental impacts of implementing an updated 10-year timber management plan for the Columbia and Alsea-Rickreall Sustained Yield Units in the Salem District, Oregon. Hereafter, the Columbia and Alsea Rickreall Sustained Yield Units will be referred to as Westside Salem Sustained Yield Units (WSSYUs, SYUs). This EIS applies to the 244,059 BLM-administered acres within the combined SYUs. These are primarily revested Oregon and California Railroad (O&C) lands.

In accordance with the National Environmental Policy Act, this EIS identifies impacts on the natural and human environment associated with the proposed action and alternatives. The proposed action, developed through the Bureau planning system using public input, is the preferred alternative. Ten other alternatives have been identified, described and analyzed to provide a wide range of options for review and consideration.

Alternatives including the Proposed Action

Under all alternatives, intensive timber management treatments would include construction of logging roads, brush field and hardwood stand conversion, site preparation with burning and herbicide application, planting coniferous trees (including genetically improved stock), animal damage control, plantation maintenance and release with herbicides or manual means, precommercial thinning and fertilization.

Variables among alternatives include amounts of land allocated to timber production, types and amounts of intensive management practices and constraints on timber harvest to benefit other resource values.

Timber harvest under all alternatives would be accomplished predominately by clearcutting, with some single tree selection for mortality salvage. There is no surplus inventory, thus none can be made available for accelerated harvest in accordance with Departmental policy. In all alternatives except 1, 5, 6, 7 and 10, the minimum average diameter of trees available for final harvest would be 17 inches diameter breast height (dbh), normally reached in 60 years. The proposed alternatives are:

Proposed Action (Preferred Alternative). This alternative would result in an annual timber sale program of 149 MM bd. ft. which includes a hardwood timber harvest. A minimum time constraint of 10 years before harvest of adjacent clearcut units would be applied when possible. Protection of riparian zones to benefit water quality, fish and wildlife would be provided. Retention of existing old-growth forest and management for unique and special wildlife habitats are included in this alternative. Habitat protection for bald eagle nesting areas would be included. Areas with highly scenic, recreational and critical environmental values would be protected through preservation or special management techniques.

1. Maximum Timber Production. This alternative would produce an annual timber sale program of 190 MM bd. ft. including a hardwood timber harvest. Except for protection of one known bald eagle nesting area, and existing recreation and progeny test sites, all commercial forest land would be allocated to intensive timber production. Timber stands available for harvest would have an average size of 15 inches dbh, normally reached in 50 years. This alternative would provide stream buffers consistent with the Oregon Forest Practices Act, however, protection for riparian zones, other wildlife habitat, visual and other resource values would not be provided.

2. Strong Emphasis on Timber Production. This alternative would produce an annual timber sale program of 176 MM bd. ft. including a hardwood timber harvest. In addition to the level of resource protection provided in Alternative 1, areas identified as fragile or reforestation problem sites would be withdrawn from the intensive timber base. Existing recreation sites and two designated outstanding and research natural areas would be retained.

3. Emphasis on Timber Production. The annual timber sale program would be 163 MM bd. ft. including a hardwood timber harvest. Under this alternative, all resources would receive similar emphasis as the proposed action except for wildlife and recreation. There would be fewer acres for recreation lands, and protection of old-growth habitat would be limited to that necessary to support one pair of bald eagles and seven northern spotted owl pairs.

4. Emphasis on Non-Timber Values. This alternative would produce an annual timber sale program of 141 MM bd. ft. including a hardwood timber harvest. Wildlife habitat corridors would be established and managed on a 350-year harvest cycle to maintain portions of BLM-administered forest in all age classes to assure the continuation of existing animal communities and to prevent genetic isolation. All other management practices and constraints would be similar to those described in the proposed action.

5. Strong Emphasis on Wildlife and Other Non-Timber Values. The annual timber sale program, including a hardwood component, would be 99 MM bd. ft. Under this alternative, a full ecosystem approach would be used to provide wildlife habitat diversity. Designated areas would be managed to produce and maintain large and small blocks of old-growth and mid-age forest habitat. These areas would be distributed over the entire SYUs rather than confined to corridors as in Alternative 4. Timber stands available for harvest would have an average size of 19 inches dbh, normally reached in 70 years. Other resource management practices and constraints would provide substantial protection to visual, recreation and other environmental values.

6. Lower Average Minimum Harvest Size. This alternative is identical to the proposed action except for a lower average minimum harvest size. Timber stands available for final harvest would have an average minimum size of 15 inches dbh, normally reached in 50 years. This would result in an estimated annual timber sale program of 155 MM bd. ft. including a hardwood timber harvest.

7. Higher Average Minimum Harvest Size. This alternative is identical to the proposed action except for a larger average minimum harvest size. Timber stands available for final harvest would have an average minimum size of 19 inches dbh, normally reached in 70 years. This would result in an estimated annual timber sale program of 140 MM bd. ft. including a hardwood timber harvest.

8. No Control of Competing Vegetation with Herbicides. This alternative is the same as the proposed action except that herbicides would not be used to control grass, brush and hardwood species growing in competition with commercial coniferous tree species. Control of vegetation for timber management by burning, grazing or using mechanical or manual means would be prescribed where economically feasible. This would result in an estimated annual timber sale program of 146 MM bd. ft. including a hardwood timber harvest.

9. No Allowable Cut Effect. The allowable cut base, management practices and constraints in the proposed action are used for this alternative. The difference is that credit for expected yields from intensive timber management practices (genetically improved stock, fertilization, precommercial and commercial thinnings) would not be taken until gains in tree growth are measured in future inventories. The annual timber sale program would be 114 MM bd. ft. including a hardwood timber harvest.

10. No Action (No Change). This alternative constitutes a continuation of the present allowable cut (156 MM bd. ft.) which, unlike the proposed action, excludes the hardwood timber harvest component. Continuation of the same management practices and constraints used in the 1972 allowable cut calculation is assumed. Minimal protection would be provided for some highly scenic areas, recreation sites and wildlife habitat.

Environmental Consequences

Air Quality

Slash burning for the decade ranges from 14,145 acres under Alternative 5 to 28,331 acres under Alternative 1. Air quality in residential areas could be impacted by particulates up to a distance of 30 to 35 miles from a fire.

Soils

Road construction, yarding, slash burning and any activity that disturbs soil cover increases soil erosion. Erosion is greatest in the first year after disturbance, decreasing in most areas to background levels after 4 to 5 years. Total erosion in the SYUs is closely related to the number of acres disturbed, thus soil erosion would be least for Alternative 5 and greatest for Alternative 1.

Water Resources

Cumulative sediments produced as a result of activities of the proposed action and all alternatives except 1 and 2 would be expected to decrease from

levels in the past decade. The range of decrease is from 2 percent for Alternative 3 to 38 percent for Alternative 5. Sediment yield for Alternatives 1 and 2 would increase 20 and 5 percent, respectively, over past decade levels. The amount of sediment produced depends on factors such as proximity of disturbance to waterways, surface drainage, stream buffer widths, percent slope, climatic events and soil erodibility.

Road building and soil compaction from logging would increase runoff and stream flow. Water yield increases could have a local minor adverse impact but the impact would be negligible to the SYUs as a whole.

Vegetation

Alterations to plant community structure and longevity would be the most significant impacts to vegetation on lands scheduled for timber harvest. Existing older forest communities scheduled for final harvest would be converted to early successional stage communities. Permanent road construction would eliminate vegetation from approximately 1,400 acres.

Animals

In all alternatives, habitat diversity would be reduced during the first decade. In the proposed action and Alternatives 3 through 9, the long-term changes that would occur to wildlife habitat would be beneficial. If Alternatives 1, 2 or 10 were selected, there would be a great decrease in mature and old-growth habitats and those species using those habitats.

Habitat removed by road construction would be permanently and irretrievably lost on roads proposed as part of the permanent road system. Reduced use of habitat by elk and large carnivores within one-half mile of these roads is probable.

In general, cold water fish habitat is expected to continue improving except where design features fail. If Alternatives 1, 2 or 10 were selected, the impacts to fisheries would be significant and adverse.

Increases in water yield could have an adverse impact on fish in small watersheds but a negligible one to the fishery resource in the SYUs as a whole. Water temperatures are not expected to change, except in Alternatives 1, 2 and 10 where no unharvested buffer strips are proposed.

The proposed action would have no known adverse impacts on any species listed by the Federal government as threatened or endangered. The northern spotted owl, listed by the State of Oregon as threatened, would be adversely impacted by Alternatives 1, 2 and 10.

Recreation

The impacts of timber management operations would be both beneficial and adverse, depending on the recreational experience desired. Visitor use increases or reductions may occur in certain areas as a result of impacts to specific recreational experiences.

Impacts would depend upon the approach and emphasis taken to meet recreational needs, degradation of desired recreational experience and effects of forest habitat simplification on recreation-related wildlife populations. Alternatives 1, 2 and 10 have few provisions to meet needs for activities other than off-road vehicle use, and visitation would be significantly impacted. Area-wide hunting, fishing and wildlife sightseeing use would be adversely impacted most significantly under Alternatives 1, 2 and 10. The proposed action and Alternatives 3 through 9 would adequately meet most recreational needs.

Cultural Resources

Appropriate measures would be taken to identify and protect cultural sites prior to ground-disturbing activities under the proposed action and all alternatives. Undiscovered cultural sites would be susceptible to considerable alteration and damage. Once a site is found, however, mitigation measures will be instituted to minimize or avoid damage.

Under the proposed action and Alternatives 3 through 10, sites discovered before logging would be fully protected. Under Alternatives 1 and 2, only sites determined eligible for the National Register would be protected in place. Known strategies for data recovery would be utilized for all other cultural sites. However, some loss of information may result in some instances where current strategies for data recovery would not be fully adequate.

Visual Resources

Alternative 5 provides the highest degree of protection for visual resources. Adverse visual impacts under the proposed action and Alternatives 3, 4 and 6 through 9 would be low. Most highly scenic and/or sensitive areas would be protected. Under Alternative 10, adverse visual impacts would be moderate, and some protection would be provided for certain highly scenic and/or sensitive areas. Adverse visual impacts would be greatest under Alternatives 1 and 2 as the visual resources of only 145 acres would be protected.

Areas of Critical Environmental Concern

Areas of Critical Environmental Concern (ACEC) designation would provide guidelines to help achieve resource protection in those areas designated. All alternatives, except 1 and 10, provide some level of ACEC designation greater than the existing situation. Designation ranges from 4 areas (505 acres) under Alternative 2 to 15 areas (11,175 acres) under Alternative 5.

Special Areas

The ecological and biological merits of Table Mountain potential National Natural Landmark would be adversely impacted by timber management operations. Impacts would be most likely under Alternative 1 and least likely under Alternative 5.

Energy Use

Fossil fuel energy would be consumed in all phases of the 10-year timber management plan. The annual energy consumption ranges from .65 trillion Btu's (Alternative 5) to 1.22 trillion Btu's (Alternative 1). The annual energy consumption attributable to the proposed action would be approximately .97 trillion Btu's.

Socioeconomics

Compared to recent economic conditions, the proposed action and all alternatives except 5 and 9 would increase employment in the timber industry and total local employment and earnings. The proposed action would result in an increase of 195 timber industry jobs and 631 jobs in total. The greatest increase in jobs would be the result of Alternative 1, 502 timber industry jobs and 1,618 total. At the other extreme, Alternative 5 would result in a net loss of 179 timber industry jobs and 577 total.

Compared with continuation of the current timber management program, only Alternatives 1, 2, and 3 would have a favorable impact on employment and earnings. In this comparison, the proposed action would result in 52 less timber industry jobs and employment of 168 fewer workers in total. Alternative 5 would result in 426 less timber industry jobs, and 1,375 less in total. Alternative 1 would result in 254 more timber industry jobs and 821 more in total.

Compared with 1980 distributions, all alternatives would result in an increase in O&C revenues to counties. Compared with continuation of the current program, the proposed action and Alternatives 4 through 9 would have negative impacts on O&C revenues while Alternatives 1 and 2 would have positive impacts. These impacts vary among counties in accordance with their dependence on O&C revenues.

CONSULTATION AND COORDINATION ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT

The Draft Westside Salem Timber Management Environmental Impact Statement (Interior DEIS 81-29) was filed with the Environmental Protection Agency and released to the public on July 9, 1981 and open to comment until September 9, 1981. A total of 46 comment letters were received. A public hearing on the draft was held August 25, 1981 in Salem, Oregon. Oral testimony was presented by eight people.

All letters and hearing testimony were reviewed and considered. Comments that presented new data, questioned facts on the adequacy of the impact analysis, or raised questions or issues bearing directly on the draft EIS are responded to in this final EIS. Some persons both testified orally and submitted written comments, resulting in duplication of comments. These comments are responded to in Response to Written Comments. Several reviewers made various resource management recommendations. These recommendations, as well as all public input, will be considered before the final decision is made.

All letters have been reproduced in this final, with each substantive comment identified and numbered. BLM responses immediately follow each of the letters. Most comments raised at the public hearing were also mentioned in letters. New comments identified in the oral testimony at the hearing have been excerpted and included in the final. These comments are indexed and appear in the Response to Hearing Comment section.

Copies of all written comments and the hearing transcript are available for public review at the Bureau of Land Management, Oregon State Office, 729 N.E. Oregon, Portland, Oregon, and at the Salem District Office, 1717 Fabry Road S.E., Salem, Oregon.

Response to Written Comments

All comment letters received were assigned an index number. Material enclosed with Letters 1 and 8 is available for review at the Oregon State Office.

Letter No.	Agency, Organization or Individual
1.	Oregon State Department of Land Conservation and Development
2.	City of Monmouth
3.	Edward C. Sargent III MD
4.	Siuslaw Task Force
5.	Advisory Council on Historic Preservation
6.	USDI, Bureau of Mines
7.	Mike Bohannon
8.	Boise Cascade
9.	Western Council, Lumber, Production and Industrial Workers
10.	Wildlife Management Institute
11.	Oregon State Forestry Department, Office of State Forester
12.	Sarah Hendrickson, M.D.
13.	Richard J. and Beth Bell
14.	Oregon State Department of Fish and Wildlife
15.	Nancy Peterson
16.	Western Forest Industries Association
17.	John W. Day
18.	Oregon Intergovernmental Relations (A-95 Clearinghouse) State Historic Preservation Officer Soil and Water Conservation Commission Parks
19.	Avison Lumber Company
20.	Mid Willamette Valley Council of Governments
21.	U.S. Environmental Protection Agency, Region X
22.	Umpqua Valley Audubon Society
23.	Mountain Fir Lumber Co., Inc., Independence Division
24.	Associated Oregon Loggers, Inc.
25.	Catherine M. Olcott
26.	The Corvallis Trail Committee
27.	Association of O&C Counties
28.	Willamette Industries, Inc., Timber Manager
29.	Robert D. Berends
30.	R. L. McNitt
31.	Vera L. Dafoe
32.	USDI, National Park Service
33.	Patricia Rogers-R.
34.	USDI, Fish and Wildlife Service
35.	Lane County Audubon Society
36.	Defenders of Wildlife
37.	Darrell Carlson
38.	Norman Marsh
39.	Starker Forests, Inc.
40.	International Paper Company, Western Operations
41.	North West Timber Association
42.	John L. Timm
43.	Corvallis Area Chamber of Commerce
44.	Industrial Forestry Association
45.	USDA, Soil Conservation Service
46.	Willamette Industries, Inc., General Manager

VICTOR ATIYEH
GOVERNOR

Department of Land Conservation and Development

1175 COURT STREET N.E., SALEM, OREGON 97310 PHONE (503) 378-4926

July 27, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, DR 97221

Dear Sir:

The Department has reviewed with interest the Draft Timber Management Environmental Impact Statement (DEIS) for Westside Salem. The proposed action strikes a reasonable balance between economic, social, environmental and energy values as they relate to forest management.

For the most part, our comments are primarily editorial. For example, the description of Dregon's Coastal Management Program (DCMP) in the last two paragraphs on page 1-23 is somewhat misleading. DRS 197 also requires state agencies to develop programs as well as local governments to develop comprehensive plans and implementing ordinances consistent with 19 planning Goals and guidelines; fourteen of these are statewide (1-14), three are coastal zone specific (16-18), one only addresses the Willamette Greenway (15) and Goal 19 is a state and federal agency responsibility for ocean resource management. The DEIS discussion appears to separate the 19 Goals into state and federal planning programs
1-1 when they are actually all state planning program requirements with geographic limitations that also meet federal CZMA approval criteria. The two paragraphs on page 1-23 could probably be consolidated to reflect this.

Table 1-6 on page 1-25 is helpful in cross-referencing the relationship of Westside Salem's Proposed Action and Alternatives to the Statewide Goals. In addition to the current description, Goal 5 should include a discussion of impacts to historic and archaeological sites, use of mineral and aggregate resources, outstanding scenic views, wetlands and groundwater resources, wilderness areas, potential and approved Dregon recreation trails, and potential and approved federal wild and scenic waterways and state scenic waterways. Much, if not all, of the information needed to satisfy Goal 5 was included elsewhere in the text.
1-2 Either coalescing the information into the table or referencing more detailed analysis by page number will clarify the DEIS's consistency with Goal 5. I've included several inventories for your information and use.

1-3 Under Goal 8, what type of "opportunities to meet most recreational needs" will be provided for? The "Recreation" section of the DEIS admittedly describes this. Again, however, please either elaborate in the matrix or cross-reference more detailed information with a page number.

1-4 Finally, the discussion of Goal 16 does not specifically address how the proposed action recognizes and protects estuarine resources, minimizes turbidity and maintains water quality. The potential for herbicide applications to be introduced to the water column must also meet the requirements of the State Forest Practices Act as the DEIS points out elsewhere in the text.

As a general comment, the matrix could be improved in two respects.
1-5 First, the "proposed action" should be referenced in each Goal section. It is not considered an "alternative" in the text and it could therefore be argued that it's not been included in the matrix. Secondly, it would be needlessly redundant to reiterate arguments that were in the Consistency Determination that had already been presented in the text, yet the determination must be supported by facts. We recommend that DEIS page numbers be included after each Goal where referencing the text elaborates on how the Timber Management Plan complies with the Goal in question.

Thank you for the opportunity to comment on the Timber Management Plan Draft EIS. If we can help further with the Consistency Determination in the Final EIS, please call Jeff Michel of my staff at 37D-5D52.

Sincerely,

Richard L. Mathews
Coastal Program Manager

JM:af
6147A/9B

cc: Bob Cortright, Field Dffice
Jim Claypool

Response to comments in Letter 1.

1-1 The discussion on LCDC goals has been reorganized for clarity. See text revision for page 1-23.

1-2 The discussion section for goal number 5 has been expanded. See text revision for page 1-25.

1-3 The discussion section for goal number 8 has been expanded. See text revision for page 1-25.

1-4 Chapter 1, Forest Management Treatments and Design Elements, of the DEIS, described standard protective measures that apply to the soil snd water resources. These measures include stream buffers, prompt reforestation, timber harvest limitations identified in the Church Report, road construction requirements, etc. The intent of these measures is to minimize water quality impacts in all drainages, including those with estuaries.

1-5 The proposed action (preferred alternative) is one of 11 alternatives being analyzed in the DEIS. As such, it is included when the term "all alternatives" is used in tables and text.

City of MONMOUTH 151 West Main Street Monmouth, Oregon 97361 (503) 838-0722

August 6, 1981

Salem District Manager
% EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Gentlemen:

Thank you for the opportunity to review your Westside Salem Environmental Impact Statement. It appears that the proposed action would have no direct effect on the City of Monmouth's water supply in the Teal Creek basin. As we
2-1 understand Table 3-5 of your report no harvest is planned within the 480 acres of BLM land in the watershed.

The City is, of course, interested in the many indirect effects on air and water quality, economy of the area wildlife habitat and others cited in the report. We will, therefore, plan to attend the August 25, 1981 hearing in Salem.

Yours truly,

Russell W. Faust, P.E.
Director of Public Works

RWF/ct

cc: City Manager

MAYOR Bill Horner CITY MANAGER Ronald Rombalski RECORDER-TREASURER Joan E. Howard
COUNCILMEMBERS: Dee Bridges, Wes Hedlund, James H. Herzog, Gail E. Lyons, Richard T. Scott, Jim Thompson

Response to comments in Letter 2.

2-1 Because there are no sales in Teal Creek Watershed included in the sample 5-year timber sale plan does not mean there would be none at any time during the decade. BLM will contact the Monmouth Water District when anything is planned in the watershed.

3

EDWARD C. SARGENT III MD
29724 MAIN - PEORIA
SHEDD, OREGON 97377
PH. 503-491-3542

8-5-81

Salem District Manager
c/o EIS Team
BLM
Portland

Dear Sir or Ms.,

I have just come back from an exhilarating and depressing trip to BLM Lands in Eastern Oregon. Exhilarating because of the beauty; depressing because the numbers of Americans that far outnumber the carrying capacity of our unspoiled lands is staring to, understandably, find out just how nice unspoiled land is compared to the clutter of cities- hence the fragile land is being invaded by more and more people.

This is conceptually important as you prepare your plan and EIS on your Salem Westside Management Plan. I support wholeheartedly any attempt of yours to preserve the mighty stands of Old Growth and relatively untouched forest under your jurisdiction. You should have- in all fairness to an overall concept- included a "no Harvest" alternative. Nonetheless, multiple use would probably dictate otherwise in the long run, though no harvest would ultimately be most appreciated. 3-1

In closing, I support Alternative 5 for its strong emphasis on less quantifiable, but more priceless, values. I do not support the use of herbicides on your or anyone elses forest land, and I do urge preservation of habitat for unique animal species. Finally, I ask your sensitivity to and support of the Corvallis to the Sea Trail.

Sincerely,

Ed Sargent MD

Response to comments in Letter 3.

3-1 The Council on Environmental Quality regulations 40 CFR 1502.14(a) indicates that the EIS should evaluate only reasonable alternatives. The CEQ has indicated elsewhere that reasonable alternatives include those that are practical or feasible from a technical and economic standpoint and using common sense. The purpose of the alternatives in an EIS is not simply to provide arbitrary benchmarks for comparison.

The Salem westside area consists of scattered BLM ownership surrounded by public and private lands. This area has been the subject of timber harvesting for many years and much of the BLM land is cut over or in young second growth. The BLM has concluded that under these conditions a "No Harvest Alternative" which would indiscriminately preserve all trees growing on the BLM land and which did not take into consideration the location, extent, or survivability of the remaining timber stands would not be reasonable. The proposed action and several of the alternatives would limit cutting in certain patches of old growth which may be stable enough to permit retention.

4

Siuslaw Task Force · PO Box 863
Corvallis, Oregon 97330

COMMENTS ON THE DRAFT TIMBER MANAGEMENT EIS FOR THE WESTSIDE SALEM DISTRICT OF THE BUREAU OF LAND MANAGEMENT

Preliminary comments:

First, we welcome the chance to have input into this planning document. However, we are disappointed that the BLM merely does an Environmental Impact Statement for the timber resource instead of a complete EIS addressing the goals and detailed management guidelines for all the forest resources. This document addresses the other forest resources only as they are impacted by timber management and does not sufficiently outline a program of management for other concerns (i.e. wildlife, recreation, fisheries, cultural resources, wilderness, etc.)

Second, there are repeated references throughout the EIS to activities being carried out "when possible" and "assuming funds are available." These statements are extremely vague. The EIS should include criteria for judging whether or not these measures will be possible. Mechanisms should allow for an annual adjustment in the allowable cut if funds for various projects is not available. 4-1

Third, we would like to see guidelines for the planning of salvage sales outlined in the EIS. Salvage sales should be announced on a regular basis along with the announcement of regular timber sales, and they should each be considered in an Environmental Assessment Record (EAR). 4-2

Finally, the concept of Ecosystem Management is one that we highly support. This concept should be applied to all the alternatives in some form, not just mentioned in connection with alternatives 4 & 5. Ecosystem Management is clearly the most promising method for maintaining the many forest resources over an extended span of time, guaranteeing sustained yield of resources as well as viable populations of forest organisms.

Range of Alternatives

The range of alternatives is heavily skewed toward timber cutting. Even the so called "strong emphasis on wildlife and other non-timber values" alternative has an allowable cut of 99MMBF. The Final EIS should have an alternative which contrasts the maximum timber alternative, i.e. a no cut alternative. This alternative would be the best for wildlife and other non-timber values. 4-3

2% or bust!

Our Preferred Alternative

We support alternative 5, "strong emphasis on wildlife and other non-timber values," because it represents the most reasonable balance of mangement for all the forest resources. We would also include in that recommendation the provisions that no herbicides be used and that timber harvests not be based on the allowable cut effect.

Our support for alternative 5 is based on the evidence that the BLM has already over-cut the district to the jeopardy of other forest resources. A significant reduction in that trend is necessary as a mitigating measure for threatened populations of elk, spotted owl, pileated woodpecker and other species of wildlife as well as for maintenance of the dwindling primative recreational opportunities, native fish spawning grounds, and unaltered forest laboratories.

Evidence of this dominance of timber resource concerns is clearly outlined by the deficiencies in the EIS when other resources are discussed. The most serious of these deficiences are listed below:

Soils

4-4 There is inadequate discussionof the impacts of timber management activities beyond initial entries into an area. The problems of soil compaction, loss of soil fertility and soil erosion are certainly compounded by repeated activities in an area over a span of 100 years or more. This should be addressed.

Fertilization

4-5 Although the future use of fossil fuels is discussed in relation to roads and logging activities, it is not brought up inthe discussion of fertilizers. Future problems with fertilizers will be related to both the supply and the cost of fossil fuels. The possible impacts on the timber program ofprohibitive costs of fertilizers must be addressed.

Wildlife

4-6 The EIS mentions that 111,000 acres, roughly half the Westside Salem SYU, of elk habitat will be adversely impacted because of roads traversing the area, bringing increased disruption of the solitude required for their survival. The only mitigating measure listed to help this situation is the closure of certain roads after harvesting. It is further stated that "past experience has shown these closures difficult to enforce and only partially effective. Assuming funds are available, efforts to close roads and to enforce closures will be continued or initiated in problem areas."

This represents a serious impact to the elk populations, and a mitigating measure that is admittedly "only partially effective" does not alleviate the problem. There also needs to be further definition of how funds are to be made available and applied to protect the elk populations.

4-7 We commend the Bureau for protecting the few remaining stands of old growth on the district. However, the EIS needs to outline the criteria for definition on an old growth forest. Also needed is an outline of how old growth forest is to be maintained on the district through the harvest scheduling in perpetuity.

Spotted Owl

4-8 A determination needs to be made as to what size core of old growth will be managed for as spotted owl habitat---the 300-acre core previously considered adequate for a viable population or the 1000-acre core which has recently been determined to be necessary. Also, the definition of required old growth forest necessary, including such things as overall acreage, density, age brackets, species, etc.,and the Bureau's definition of old-growth need to be presented. Documentation of why the owls will continue to disappear as a result of this proposal and mitigation measures to reverse that trend should also be outlined.

Snags

4-9 First, there should be a discussion of the differences between hard snags, soft snags and "created" snags in terms of their use by snag-dependent wildlife. Then management guidelines need to address those differences rather than simply calling for two snags per acre.

The EIS states that the two snags per acre requirement has not been met, but goes on to say that it will be required of any new harvest areas. However, it is then stated that "it would take four snags per acre on newly harvested areas to make up current deficiencies." It seems only logical that four snags per acre be left until the errors of past timber management be corrected.

4-10 The EIS further states that "snag size on the younger stands would probably not exceed 17 inches which would be large enough for all species except the pileated woodpecker." The extent of this deficiency in providing for pileated woodpecker habitat is needed. Then if the pileated woodpecker habitat is in serious danger, mitigating measures need to be outlined in the EIS to protect the habitat.

Clearcuts

4-11 Goals mean nothing when planning ignores them without reasons. Forty-one of 376 proposed sale units would exceed the recommended 40 acres in size and Ninety-one units would not meet the 10-year buffer strip criterion. Criteria for the allowance of exceptions to planning goals need to be outlined in the EIS.

Herbicides

4-12 As we stated earlier, we do not support the use of herbicides on the forest. The comparison of herbicides to other forms of brush control needs to be documented in terms of threat to human health, water resources, wildlife and non-target plant species as well as in terms of economic costs. More detailed measures to ensure that herbicides will not contaminate streams, wildlife and soils are also needed.

Reforestation

4-13 The backlog in reforestation needs to be addressed in relation to future replanting and the determination of future harvest levels based on expected growth. Also, the EIS does not consider the planting

4-14 of any species beside the Douglas-fir, which represents a significant reduction in the diversity of district lands and poses a threat to the ecological stability of the region. We recommend that a range and mixture of native tree species be planted on the district.

Recreation

4-15 One of the major recreational resources on the district is the proposed Corvallis-to-the-Sea Trail. This trail is mentioned, but there is no documentation as to the impacts of the timber program on the trail. These impacts should be addressed, and an outline of Bureau involvement in the project should be presented.

Nationwide Rivers Inventory

Under the 1979 directive handed down by President Carter in regard to the Rivers inventory, each project within ¼-mile of a proposed Wild and Scenic River must be analyzed for its impacts to the river. Guidelines need to be set down to ensure that this is done for all the rivers included.

ACEC's and National Natural Landmarks

4-16 A clear definition of the criteria for an Area of Critical Environmental Concern (ACEC) should be in the EIS. Also guidlines for management of ACEC's need to be outlined, and district policy in regard to National Natural Landmarks should be determined and put in the EIS. The Siuslaw Task Force nominated the Parker Creek drainage for an ACEC. Why isn't that mentioned?

The Allowable Cut Effect

We do not support the use of the Allowable Cut Effect in determining present harvest levels. We feel that the ACE does not correctly discount the old growth component of existing forests and allows for too high a level of cut now since the future benefits of intensive management practices can be affected by so many unknown variables such as the cost and supply of fossil fuels, the lag in replanting, and compounded degradation of site productivity.

Economic Analysis

4-17 The Draft EIS is totally void in a discussion of the economic costs of implementation of each alternative. What funding levels are required of each alternative? How much more funding will be required to carry out the same program in the future? Will the allowable cut be adjusted if funding isn't available for the program?

This concludes our remarks. We appreciate the opportunity to contribute to this planning process.

Mike Bohannon

Mike Bohannon, president
Siuslaw Task Force

Response to comments in Letter 4.

4-1 Funding and personnel needed to implement the chosen course of action will be identified in the decision document. If the funding is not available, the program would be adjusted so timber sale levels and intensive management practices would remain in balance. The use of "when possible" for some proposed management actions is intended to give flexibility for decisions which must be based on site specific information rather than broad planning guidelines.

4-2 The guidelines for the planning of salvage sales are the same as those for final harvest clearcut sales. The environmental consequences of salvage sales are addressed in environmental assessments.

4-3 See response to comment 3-1.

4-4 Research on nutrient losses and erosion due to repeated entries into a timber stand is lacking. Loss of production from soil compaction is better understood.

In the Coast Range, recent studies by Wert and Thomas (Soil Science Society of America Journal Vol. 45 No. 3 May-June 1981) show compacted areas such as skid roads produce 74 percent less timber volume than undisturbed areas.

The soils remain compacted for at least 32 years (Ibid) so repeated entries add to the area compacted, unless the same trails are used. This loss of productivity can be partially alleviated by tilling the compacted areas following final harvest. This mitigating measure can result in an estimated 50 percent recovery of the productivity loss. This loss of production has been recognized for the initial rotation by reducing the anticipated yield by 1.8 percent in the Alsea-Rickreall SYU and 2.6 percent in the Columbia SYU.

4-5 Table 3-15 (page 3-44 in the DEIS) identifies the estimated annual energy consumption attributable to the use of fertilizers. Fertilization was estimated to cost about $100 per acre and would have an assumed energy requirement of 122,000 Btu's per dollar of cost. As with the other treatments analyzed, these costs and energy requirements are not prohibitive. A fertilization program must be cost-effective to be adopted. Response to comment 4-1 dealing with funding also applies to the practice of fertilization.

4-6 Funds would be made available through the normal budgeting process and priorities will be determined on a case by case basis.

The possibility exists that road closures could be accomplished through cooperative agreements with other organizations that have interests in the area. This approach has been used on a limited basis but the extent of this possibility has not been determined.

4-7 A definition of old growth has been added to the glossary. See text revision for page G-7.

If the proposed action is adopted, existing old-growth forest would be withdrawn from harvest and be allowed to perpetuate itself by a continuation of natural succession.

4-8 If the 1,000-acre core area recommended by the Task Force is necessary, then the owls would decline since not enough habitat would will be continued in order to more fully evaulate the impacts of the decision.

A possible mitigating measure would be to withdraw more lands from harvest and allow them to age until northern spotted owl habitat was created. This, of course, would be a long-term approach. No short-term solution currently exists.

4-9 Hard snags are not utilized to the extent that soft snags are; however, they become soft snags in time. Created snags are hard snags. Because of safety regulations, it is difficult to leave soft snags; live trees that can be converted to snags are much less of a safety hazard.

4-10 If the proposed action were adopted, it is estimated that populations of pilested woodpeckers would drop about 2 percent below current levels for several decades, then as more acres of older larger trees became avsilable, increase to about 4 percent above current levels. While this is an increase, the population would remain at low levels, and the pileated woodpecker would continue to be adversely impacted.

4-11 Salem District policy is to meet these goals when possible. Rationale for the two situations mentioned are as follows: Those units exceeding 40 acres in size do so because it is environmentally or economically preferable. For instance, longer yarding distances and larger units result in fewer miles of road construction over fragile soils. If the Bureau is to sustain the proposed harvest level and maintain the integrity of the overall habitat management plan, the 10-year spacing goal may not be obtainable.

4-12 The comparison of herbicides to other forms of brush control is provided by the No Herbicide Alternative (No. 8). The Vegetation Management with Herbicides FEIS (incorporated by reference in the text) provides additional comparison.

4-13 The existing reforestation backlog in the EIS area is minimal. As for the effect on future harvest levels, a regeneration lag time has been calculated for the SYUs based on past experience. It includes the period of time from the date of sale to the date the post-planting stocking survey shows the unit is adequately stocked. The weighted average period of time is actually 5.4 years, rounded to 5 years which was input into the allowable cut runs.

4-14 There was an omission in the draft. Some commercial hardwood species would be planted in addition to the commercial conifer seedlings mentioned. See text revisions for pages 1-14 and 3-13.

4-15 BLM recognizes the development of Corvallis-to-the-Sea Trail as a high priority in relstion to all "connector" trails proposed for inclusion in the Oregon Recreation Trails System. The proposed Management Framework Plan (MFP) for the Westside of the Salem District, available for review in the Salem District Office, identifies a number of management actions for the trail. Table 3-11 (page 3-33 of the DEIS) identifies potential impacts of the sample 5-year timber sale plan on the proposed trail. Potential impacts to the trail and mitigation measures will be further analyzed in the environmental assessments which precede each sitespecific timber sale.

4-16 Management of the Parker Creek area has been fully considered during the Salem District's planning process for the Westside area. The proposed Management Framework Plan (MFP) identifies 120 acres in Upper Parker Creek to be managed for botanical sightseeing opportunities and 60 acres in Lower Parker Creek to be managed as part of the North Fork Alsea River Recreation Lands. The area was not considered for ACEC candidacy because its primary resource values are recreational. Although BLM recognizes recreation as an important resource, it is not among the values for which ACECs can be designated.

4-17 Implementation cost estimates for the alternatives will be presented in the decision document. Funding requirements will be developed after a management program has been decided on. Funding requirements for continuing the present management program in future years would depend on economic conditions including the timber market, inflation and other factors. If funding were not sufficient to accomplish all elements of the timber management program, a reduction in annual cut might be necessary.

5

Advisory Council On Historic Preservation

1522 K Street, NW
Washington, DC 20005

Reply to: Lake Plaza South, Suite 616
44 Union Boulevard
Lakewood, CO 80228

August 11, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Sir:

Thank you for your recent request for comments on the environmental statement for the Westside Salem Timber Management, Oregon. Pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969 and the Council's regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800), we have determined that your draft environmental statement appears adequate concerning our area of interest, and we have no further comments.

Sincerely,

Louis S. Wall
Chief, Western Division
of Project Review

6

United States Department of the Interior

BUREAU OF MINES
WESTERN FIELD OPERATIONS CENTER
360 EAST 3RD AVENUE
SPOKANE, WASHINGTON 99202

August 11, 1981

Memorandum

To: Salem District Manager, c/o EIS Team (922), Bureau of Land Management, Portland, Oregon

From: Chief, Western Field Operations Center

Subject: Draft Environmental Impact Statement for the Westside Salem Timber Management Plan

Thank you for the opportunity to review the Westside Salem Timber Management Draft Environmental Impact Statement. This should not be considered as a formal review but rather as technical assistance concerning geology and mineral resources.

6-1 We found the statement to be generally well written but somewhat incomplete as regards mineral resources. The proposed action is not expected to adversely impact mining or future mineral resource utilization in the area. However, we suggest that mineral related activities be at least briefly assessed somewhere in the discussion of the existing environment or in the discussion of anticipated impacts.

The proposed action should have beneficial impacts on mineral resource exploration and utilization because of the increased access and possible exposure of mineralized areas or zones resulting from decreased vegetative cover and road excavations.

R. N. Applino, Jr.

Response to comments in Letter 6.

6-1 Analysis, including the scoping process, indicated that timber management would not significantly impact mining or future mineral resource utilization. Therefore, as stated on page 3-1 of the DEIS, these topics are not discussed.

Aug. 10, 1981

Dear Salem District Manager,

Following are some comments on your Draft Timber Management Environmental Impact Statement for the Westside Salem District:

1. A majority of our land (this includes all ownerships) is developed or allocated to be developed so I feel that it is essential that areas that are going to be adversely impacted by man's activities be identified and then protected (especially on federal land). I therefore recommend that a clear policy be presented for "Areas of Critical Environmental Concern". I recommended and submitted to Scott Absher a detailed map with justification for the Parker Creek and North Fork Alsea canyon (as ACEC) at the beginning of your planning process. I never received any feedback from this recommendation. Is the ACEC program alive on the Salem District? Are lands that can be adversely effected by man's impacts being adequately protected on the Salem District?

2. The Corvallis-to-the-Sea trail was only mentioned once. As you know, we have now routed this trail on public right-of-way land and it is flagged across BLM land and has been inspected by BLM staff which recommended minor changes. The Corvallis Trail Committee would like to see more detailed information in the final EIS and more definite plans for the trail. 7-2

3. I support alternative 5 because it has a stronger emphasis on wildlife and other non-timber values

Multiple Use

4. I fully support your plan to maintain existing stands of old growth and to manage for old growth in the future but there is a need for a clear definition of what exactly old-growth forest is. Can this be emphasized and clarified in the final EIS? 7-3

5. As usual your range of alternatives did not have a "no harvest" alternative. All resources out there can be healthy and exist without the aid of man. This alternative should be included for comparison purposes. 7-4

Thank you for the opportunity to comment on your plan.

Respectfully,

Mike Bohannon - President
Siuslaw Task Force

Response to comments in Letter 7.

7-1 See response to comment 4-16.

7-2 See response to comment 4-15.

7-3 See response to comment 4-7.

7-4 See response to comment 3-1.

Timber and Wood Products Group

Boise Cascade

Northwest Oregon Region
P.O. Box 290
Monmouth, Oregon 97361
503/838-1610

August 17, 1981

Salem District Manager
c/o EIS Team (922)
United States Department
of the Interior
Bureau of Land Management
Oregon State Office
P.O. Box 2965
Portland, OR 97208

Re: WESTSIDE SALEM TIMBER MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Gentlemen:

Realizing the wide range of interests, desires, and philosophies concerning the numerous alternatives as suggested for the Salem Environmental Impact Statement (EIS), it would seem reasonable to use a "middle of the road" approach. Alternative #3 seems to take into account all aspects of land management, recognizing the needs of the timber industry, wildlife interests, recreation and visual considerations, plus O & C revenues.

On the surface, it appears your proposal (preferred alternative) is not that different from #3, 149MM/year as opposed to 163MM/year--a mere 9.4% decrease. The real crux of the matter, of course, is the age and quality of timber involved in the two alternatives. I cannot conceive the BLM proposing to preserve most of their old growth timber and harvesting young timber, in lieu of the old growth. This is against all logic and a terrible waste of money and our natural resources. Your suggestion of retaining stagnant old growth timber which is losing volume due to decay, wind throw, and actual death; and cutting vigorous young growing stands instead, is criminal.

To get into specifics as they affect the Northwest Oregon Region of Boise Cascade Corporation, I refer to the following:

> We understand the need for preserving "Areas of Critical Environmental Concerns," as discussed on pages 2-28 in your EIS, but question the acreages and values involved (see table 2-12). A case in point is area #6, known as the Valley of the Giants, which is located about 15 miles Northeast of Valsetz. There now exists a 47 acre tract set aside to view these large high quality fir and hemlock trees. Our Company encouraged this action and we have granted access to this site via our road system.

This area is immediately adjacent to an existing road and a bridge has been constructed and trails built through the timber. Even with these amenities, a trek through 47 acres of Western Oregon timberlands is a chore. I question the need to add an additional 249 acres of very "perishable wood." This large, high quality timber is quite subject to butt rot and winter storms raise particular havoc in this type of timber, resulting in excessive breakage in the lower high quality logs. The 249 acres probably contain in excess of 18MMBF of timber with a stumpage value between $90-93,000,000.

On page 2-39 you refer to local communities where BLM harvests account for as much as 25% of log supplies and an equivalent amount of timber industry employment. Boise Cascade has mills in four of the eight communities mentioned.

Your suggested proposal would especially affect our Valsetz operation where we buy and have bought most of the BLM timber offered in the area. Since most of the BLM timber tributary to Valsetz, like the Valley of the Giants area, is old growth, I assume it would be set aside. This will have a devastating effect on our Valsetz operations.

In 1972, we entered into a detailed right-of-way agreement with the BLM for use of our road systems. The assumption was that each party would pay their fair share of road replacement costs. We entered into this agreement fully expecting fair treatment. The terms of the contract basically were that BLM's share of the road replacement costs for those roads covered at the time the agreement was signed were $208,515 to be paid off at the rate of $2.00/MBF. Your accounting balance shows only $46,758 owed to us. However, you have erroneously credited us with $29,322 on 14,661MBF of timber, hauled or to be hauled over roads which were not accounted for and no share cost analysis has been made (our 1400 road to be specific). At any rate, we only receive monies when BLM timber is hauled and since, conceivably, only limited volume would be hauled, we will be out this money--so much for fair treatment.

In the area tributary to Valsetz, located in Township 9 South, Range 8 West; Township 9 South, Range 7 West; Township 8 South, Range 8 West; and portions of Township 9 South, Range 5 West; and Township 7 South, Range 8 West; BLM owns about 11,500 acres and Boise Cascade owns in excess of 49,000 acres--or 81% of the land (see attached map). We also built, own, and control, in excess of 81% of the roads in the area.

The point of this is that the BLM, although a very small landowner, is attempting to set land policies for the major landowners. We as a substantial timber landowner in this region are fully aware of our obligations to the public, as well as our stockholders. Boise Cascade Corporation gladly complies with all the rules and regulations concerning the protection of all resources.

8-1 Hunting, fishing, sight-seeing, firewood cutting, and other recreational pursuits are allowed on our lands, but we do not condone a large build up of an elk population as your proposal would create, resulting in our lands being the major "feeding grounds." We object to this, along with your other economically questionable policies concerning the use of our natural resources.

We are most interested in what happens within the Salem BLM District as your land management program affects our Company very directly. Thank you for asking, and considering our comments in this matter.

Very truly yours,

Robert A. Johnson

Robert A. Johnson
Region Logging Manager

RJ:mb

Response to comments in Letter 8.

8-1 The projected increase in the elk populations was based on changing habitat conditions on Bureau-managed lands. As pointed out earlier in your letter, the Valsetz area is primarily in other ownership so it is unlikely that a large increase of elk would occur in that area.

WESTERN COUNCIL
Lumber, Production and Industrial Workers

BLUE MOUNTAIN DISTRICT COUNCIL
CENTRAL CALIFORNIA DISTRICT COUNCIL
CENTRAL OREGON DISTRICT COUNCIL
CENTRAL WASHINGTON DISTRICT COUNCIL
CODS BAY AREA DISTRICT COUNCIL
INLAND EMPIRE DISTRICT COUNCIL

228-0235

NORTHERN CALIFORNIA DISTRICT COUNCIL
PORTLAND COAST COLUMBIA DISTRICT COUNCIL
PUGET SOUND DISTRICT COUNCIL
REDWOOD DISTRICT COUNCIL
SOUTHWESTERN COUNCIL OF INDUSTRIAL WORKERS
WILLAMETTE VALLEY DISTRICT COUNCIL

721 S.W. OAK STREET

PORTLAND, OREGON 97205

August 18, 1981

Salem District Manager
c/o EIS Team (922)
BUREAU OF LAND MANAGEMENT
P. O. Box 2965
Portland, OR 97221

Dear Sir:

The Western Council of Lumber, Production and Industrial Workers union urges the Bureau of Land Management to substitute "Alternative 3" for the "Proposed Action" on the Westside Salem Sustained Yield Units (WSSYU). This recommendation and subsequent comments are based upon the DEIS which indicates that timber harvests on the WSSYU can be increased while at the same time forest management practices can be carried out which provide for expanded recreational opportunities and the preservation of the bald eagle and spotted owl as well.

In light of projections by the Congressional Budget Office that show domestic demand for wood products outstripping available supplies by upwards of six fold per year through 1990, it is inconceivable that the BLM is seriously considering a ten year timber management plan that would reduce current harvest levels on the WSSYU.

The Proposed Action is irresponsible in its foregone exacerbation of the Westside's timber supply crisis. The Oregon Department of Forestry's recent report, 1980 Oregon Timber Supply Assessment, portends a 20% decline in western Oregon's annual timber harvests; in a large part due to inadequate harvest levels on federally-owned forests. Thus the Proposed Action can only make a bad situation worse. With existing harvest shortfalls already contributing to a shift in forest products manufacturing capacities from the Pacific Northwest to the Sunbelt, the Proposed Action must be rejected on the basis that it condems the region's leading industry, its employees and their communities to astringent economic consequences. The communities of Dawson, Philomath, Dallas, Grand Ronde, Independence, Valsetz, Sheridan and Willamina would be impacted the most severely because, as the DEIS elucidates, they are "dependent upon BLM harvests for 10 to 25 percent of their log supplies."

By contrast however, Alternative 3 would not only increase harvestable timber supplies, it would also create (on an average over the first decade) nearly one thousand jobs and $10.6 million in earnings annually. An economic stimulus

of this magnitude would have a significant and positive impact on the area's relatively low rate of per capita income and relatively high unemployment rate.

It is important to note that while Alternative 3 will increase both harvest and employment levels, it does not do so at the expense of either the bald eagle or the spotted owl. The habitat of both species will be protected under Alternative 3 with provisions for the preservation of the spotted owl meeting criteria established by the Oregon Endangered Species Task Force. Alternative 3 evinces further concern for the environmental welfare by providing for unharvested buffers in riparian zones which serve to reduce stream sedimentation.

Alternative 3 also provides for recreational opportunities within the WSSYU. Under this option the public's cross-country skiing, snowshoeing, hiking, horseback riding, fishing and backpacking opportunities would all be improved.

Alternative 3 strikes a commendable three-way balance between the need for jobs and harvestable timber, the need to protect endangered species and the environment and the public's need (in whose trust these lands are held) for recreational outlets. It would be a tribute to rational and responsible forest planning if the BLM implemented this option on the WSSYU. It is seldom the case when three such diverse and often times contradictory needs can be addressed and then molded into a forest planning paragon. As such the LPIW strongly urges the BLM to select Alternative 3 as the ten year timber management plan for the Westside Salem Sustained Yield Units.

Sincerely,

WESTERN COUNCIL
Lumber, Production & Industrial Workers

BRADLEY K. WATT
Researcher

BKW:jc
opeu 11/afl-cio

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

August 18, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
Post Office Box 2965
Portland, Oregon 97221

Dear Sir:

The Wildlife Management Institute is pleased to comment on WESTSIDE SALEM, DRAFT TIMBER MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT, Oregon.

We commend BLM for the Preferred Alternative proposal to retain the existing old growth on the unit. We are also pleased to see a snag mitigation proposal (p 3-22).

However, we much prefer the old growth amounts, creation, distribution and corridor concepts of alternative 5 rather than just preserving what is left. Some additions in amount and corridor management need to be made to the preferred alternative.

O-1 Other clarifications and additions are needed. Old growth acreages given in the text and tables are confusing. For example, 11,800 acres of old growth are proposed for retention (4.83 percent of BLM land), p 1-7. Yet only 5,700 acres are true old growth (p 2-20) and 6,100 acres are areas with a scattered overstory of old trees (p 2-20).

O-2 In Tables 1-3 (PA, Alt. 4 and 5) and in Table 1-5, old growth at 1st and 10th decade, we are at a loss to interpret the various and different acreage figures. Since the key issue and controversy in this EIS is old growth, we suggest a special table and section of text devoted exclusively to that subject.

O-3 The snag mitigation on page 3-22 should include plans on how the created snags may be prevented from wind throw. Some plan for retention of forage logs also should be included.

The great justification for old growth retention is presented on p 3-19, 2nd par. This statement of old growth being only on Federal land must be featured in the summary and description of the actions.

The EIS is well written and the appendix material is good. The statement would benefit from modification to include more ecosystem management by making long-term commitments to enlarged old growth acreage.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:lbb

DEDICATED TO WILDLIFE SINCE 1911

Response to comments in Letter 10.

10-1 Page 1-7 has been changed to be consistent with page 2-20. See text revisions.

10-2 Table 1-3 deals with the timber production base acres and does not project acres by age class. The 17,160 acres listed under Alternative 4 simply reflect the acreage managed on a 350 MHA in the constrained timber base. These acres would provide old-growth habitat and replacement stands in all younger age classes. Additional acres of old growth would be available in areas withdrawn for other purposes (See Table A-2). See Tables 2-4 and 3-8 in the DEIS to find old-growth figures.

10-3 The density of an average of two snags per acre was established as a general guide for snag retention. No policy has been established for identifying the specific locations of snags in order to maintain maximum flexibility in timber sale administration. Snag locations will be determined through site specific analysis. An attempt will be made to locate snags in areas that will minimize chances of windthrow.

The proposed MFP calls for leaving at least 10 percent of down woody material including large trees and branches. These are used as forage logs and cover by wildlife.

Forestry Department
OFFICE OF STATE FORESTER
2600 STATE STREET, SALEM, OREGON 97310 PHONE 378-2560
VICTOR ATIYEH GOVERNOR

August 21, 1981

Mr. Joseph Dose
Salem District Manager
C/O DEIS Team (922)
Bureau of Land Management
PO Box 2965
Portland, OR 97221

Dear Mr. Dose:

Our letter and review dated August 14th contained several errors. The following is the corrected version of the review.

The Oregon State Forestry Department has reviewed the BLM Westside Salem District Draft Environmental Impact Statement (DEIS). The attached summary of our comments includes a discussion of consistency with state objectives, the existing situation analysis and the appropriateness of the socioeconomic analysis.

Thank you for this opportunity to respond. We look forward to continued coordination with the Salem District.

Sincerely,

Ronald E. Smith
Associate State Forester

HMM:SJ:mak
1419C

cc: Board of Forestry
Executive Staff
Area Directors
Oregon Congressional Delegation
Don Matlick
Mike Templeton
Doug Tistadt
Millard Trout
Pat Amedeo
State Clearinghouse (PNRS 8107-4-270)

OREGON STATE FORESTRY
DEPARTMENT REVIEW OF THE
BLM WESTSIDE SALEM
DISTRICT DRAFT
ENVIRONMENTAL IMPACT STATEMENT
(DEIS)

Consistency with the Forestry Program for Oregon (FPFO)

It is the Board of Forestry's policy to promote a statewide forestry program which meets the following objectives:

1.) maintains or increases annual allowable harvests;

2.) maintains community stability;

3.) utilizes a full range of intensive management practices; and,

4.) maintains the existing commercial forest land base.

The Forestry Department encourages the BLM to be consistent with these state objectives where they do not conflict with BLM mandates.

There has been some confusion over the appropriate philosophy behind the ranking of land use alternatives according to their consistency with FPFO. Table 1-7, in the DEIS, ranks each alternative, including the proposed action, according to BLM's perception of consistency with statewide objectives. The BLM's approach to ranking the alternatives has been to use both statewide objectives, and federal mandates. For example, the proposed action calls for a 15% decrease in the commercial forest land base; the BLM ranked this as being consistent with state objective because several federal mandates require these decreases in land base to meet other objectives. But this is not consistent with the state objective to maintain the commercial forest land base.

At the July 21st meeting both the BLM and Forestry Department agreed that a more useful approach would be to rank alternatives in light of statewide objectives regardless of federal mandates. Then, if there are inconsistencies between federal mandates and state objectives they can be identified and the BLM will have fulfilled its legal mandate to be "consistent where possible" with state programs.

11-1 The proposed action is not consistent with the land base objective, and minimally consistent with the harvest level and community stability objectives. (There is not enough information to test consistency with the intensive management objective). The Forestry Department urges the selection of an alternative which is consistent with state objectives.

The Existing Situations

Although the DEIS analyses the impacts of a "no action" alternative, this alternative was not designed to represent the existing situation. It instead represents a continuation of the assumptions that were used for the 1972 allowable cut calculation.

11-2 The Forestry Department recommends that the BLM use the existing situation as a yard stick for measuring each alternative. Without this measure it is difficult to objectively assess proposed changes. Of particular interest would be a table which displays the existing situation acreage figures for commercial thinning, herbicide spraying, manual and mechanical release, precommercial thinning and fertilization.

Socioeconomic Analysis

The socieconomic section of the DEIS presents an approach to impact analysis which is a variation of the standard BLM approach. The standard approach is to compare the allowable cut (planned sales) figure for the past decade with each allowable cut for the proposed alternative. The difference in cut lands is then translated by multipliers into losses or gains in employment or public revenue.

The new BLM approach uses the average timber harvest level for three years and compares it with the proposed allowable cut level to develop the impact figures. This approach is flawed because the impacts then become a function of actual timber harvests for any number of groups of years in the previous decade. Therefore the impacts will change dependent upon the years selected.

11-3 For example, based upon the allowable cut (planned sales) figure from the previous decade, the proposed action reduces the allowable cut from 156 MMBF to 146 MMBF. This a 6.4% decrease which also represents a loss in number of jobs, personal earnings and public revenue. However, based upon the average timber harvest figures (for a 3 year period. 1975 - 1977) the proposed action appears to raise the allowable cut from 122 MMBF (the average timber harvest for 1975 - 1977) to 146 MMBF, a 19% increase. This increase will show a dramatic increase in number of jobs, personal earnings and public revenue. This distortion will vary depending upon the actual timber harvests used from the previous decade.

The BLM should continue to use the allowable cut or planned sale figures to calculate socioeconomic impacts. If actual harvest levels are used, then the average harvest for the decade should be used. It is essential that impacts are calculated consistently on all Districts and that the impacts not be distorted by assumptions.

HMM:SJ:mak
1419C

Response to comments in Letter 11.

11-1 The consistency rating of the alternatives has been changed. See text revisions for page 1-27, Table 1-7.

11-2 The inputs into the 1972 allowable cut calculations did not include the full range of treatments displayed in Table 1-2. If the 1972 timber management plan were to continue in effect for the second decade, the estimated treatment acres based on the latest inventories would be:

Treatment	Acres
Commercial thinning	3,686
Herbicide site preparation	4,520
Manual site preparation	300
Mechanical site preparation	4,861
Plantation protection	10,465
Plantation maintenance and release	14,675
Precommercial thinning	3,850
Fertilization	0

11-3 As a baseline for assessing economic impacts, a theoretical level of local economic activity based on an allowable cut level or even on timber sales has some utility to the decisionmaker. It is not, however, very relevant to predicting changes in actual local economic activity generated by the BLM management program. The most appropriate baseline for assessing such changes is the current economic situation. The choice of the time period selected to represent the current situation, however, is affected by available data and the need to avoid merely transitory conditions. The 3-year period, 1975-77, was selected for use in the EIS because it is the period covered by BLM's log flow analysis, which is the key to baseline data displayed in Table 2-17. Analysis for a more recent period was not made because available data were considered a reasonable representation of the recent past. Other harvest level benchmarks that might be considered relevant are:

Period	Average Harvest (MM bd.ft.)	Percent change attributable to Proposed Action
1976-78	125.5	+ 18.7
1977-79	122.6	+ 21.5
1978-80	121.5	+ 22.6
1976-80	128.8	+ 15.7
1971-80	158.5	- 6.0

Response to comments in Letter 12.

12-1 See response to comment 4-15.

WESTSIDE MEDICAL ASSOCIATES
Physicians & Surgeons
572 W. 11th
Eugene, Oregon 97401
Telephone (503) 687-0872

Sarah Hendrickson, M.D., P.C.
Tom A. Jefferson, M.D.
Diplomates, American Board of Family Practice

Scott Halpert, M.D., F.A.A.P
Diplomate, American Board of Pediatrics

12

August 20, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

Re: Westside Salem Draft Timber Management Environmental Impact Statement

To Those Concerned:

I would like to encourage the BLM to manage the Oregon coast range forests for a true multiple use rather than primarily for timber sales. From my own economic experiences here in Eugene it is clear to me that diversity is the key to a healthy economy. I therefore strongly support Alternative 5 "strong emphasis on wildlife and other non-timber values."

I feel clearly that any land management plan should place strong emphasis on recreational values in the coast range as potentially a more significant economic contribution to our local area than will a single use management plan. It is important that nominated National Natural Landmarks such as Table Mountain be protected from adverse timber program activities.

12-1 I would also like to see the BLM address the Corvallis to the Sea Trail with clearer policy guidelines for trail planning and impact to the timber program.

Thank you very much for your attention.

Sincerely,

Sarah Hendrickson, M.D.

SH:sg

Gentlemen:

I'm writing to comment on the Westside Salem Draft Timber Management E.I.S.

I support your plan to maintain existing stands of old growth timber and to manage for old growth in the future, since they are so important in protection of old growth dependent plants and animals. However, your definition of what is old growth is unclear and I would need to know in order to determine if it will really protect the dependent species. 13-1

It would also be, for comparison purposes, useful to present an no harvest alternative. 13-2

I support as your best Alternative #5, believing this represents the best balance of timber harvest with protection of other resources. This is true since in my opinion the land has already been overcut

Please present a clear policy towards critical areas of Environmental Concern. These special land allocations such as nominated rivers for the National wild & scenic River status and National Landmarks are especially important to protect from adverse timber program activities. 13-3

I also think that more attention be spent on the Corvallis-to-the-Sea Trail, setting out guidelines for BLM involvement in trail planning & impact of timber program on the trail. 13-4

Thanks very much for your consideration of our viewpoints.

Yours very truly,
Richard J. & Betty Bell

Response to comments in Letter 13.

13-1 A definition of old growth has been added to the glossary. See text revision for page G-7.

13-2 See response to comment 3-1.

13-3 USDI, BLM 1980a (see References Cited in the DEIS) contains general policy and guidelines for ACECs. Further information, including the proposed Management Framework Plan (MFP), an ACEC identification summary and ACEC plan element, is available in the Salem District Office. The identification summary documents the criteria evaluation, staff analysis and public participation for nominated and proposed ACECs. The ACEC plan element provides a specific description, management objectives and special management requirements for all proposed ACECs. Following designation, activity plans are prepared to translate management requirements into on-the-ground implementation actions.

13-4 See response to comment 4-15.

14

Department of Fish and Wildlife
OFFICE OF THE DIRECTOR
506 S.W. MILL STREET, P.O. BOX 3503, PORTLAND, OREGON 97208

August 26, 1981

Mr. Joe Dose
Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Mr. Dose:

Attached are the comments of my staff based on review of the Draft Environmental Impact Statement for timber management in the Westside Salem sustained yield units.

The planning efforts of the Bureau of Land Management and other public land management agencies are vital to the success of Oregon's fish and wildlife program and I want to compliment you and your staff for the effort that you are devoting to such an important task. Although we may not always agree on the particular alternative selected, I trust that you understand our role is to assure that the predicted impacts of any land management decision are defined on the basis of our best judgment, since that is our responsibility. At the same time, I appreciate that the final decision rests with the land manager.

Sincerely,

Robert U. Mace

Robert U. Mace,
Acting Director

RUM:sjw

Attachment

cc: State Clearinghouse, Intergovernmental Relations Division

Oregon Department of Fish and Wildlife

Staff Comments on

Bureau of Land Management

Westside Salem Timber Management OEIS

August 26, 1981

After staff review of the draft EIS we would like to see the following items clarified or addressed in greater detail in the final EIS.

14-1 Page 1-7, paragraph 1. What management action or protection is provided for first and second order streams without fish or water diversions. Importance of the contribution of these streams or channels is often overlooked in their effects on downstream water quality and quantity.

14-2 Page 1-14. The paragraph describing site preparation with the use of herbicides needs clarification. The impacts on wildlife of herbicide use in site preparation can be severe or minimal. If narrow spectrum herbicides are applied around the perimeter of newly planted trees by use of backpack sprayers, the impacts on wildlife are insignificant. If broad spectrum herbicides are applied aerially to a fresh clearcut, the wildlife impacts are severe on those species using early seral stages. Deer and elk rely on forage in recent clearcuts, so the elimination of forage producing vegetation can subject the newly planted trees to damage from big game.

14-3 Broadcast burning of slash is preferred when considering wildlife values. It is recommended that the burns be cool enough to preserve cull logs and snags. The FEIS should include discussion of burning techniques and standards that allow determination of the impacts and what mitigative techniques will be employed.

Page 2-20. The proposed action, if implemented, will reduce the amount of remaining old growth stands by one third. The amount of that habitat type in Northwest Oregon is already below the five percent objective level. As displayed in the DEIS on page E-1, only two percent of the forestlands in Northwest Oregon, and only three percent of BLM administered forestland, are in old-growth habitat. Vigorous protective measures are necessary to maintain old-growth forests, not only for wildlife, but as a future source of other forest products as well.

14-4 Page 2-21, paragraph 7. The statement "that streams in the SYU's are currently producing at 50% of optimum for native salmonids," is unclear. The statement should be species related. Case in point: We know that many streams are not producing coho at maximum levels, but they may be at optimum for resident trout. Also, if a stream was brought up to maximum production it might lower the optimum for steelhead and/or cutthroat.

14-5 The statement that chinook steelhead and cutthroat are of moderate abundance is too all-inclusive for such a large geographical area. It is also in conflict with Table 2-8 on page 2-22, which indicates that these same species are declining. The variability in stream systems and species is too great for this type of overall statement.

Page 2-21, paragraph 1. We are concerned about the condition of habitat for animals that require snags, dead and down material. Your own surveys indicate the presence of 0.26 snags per acre, despite a BLM goal of two snags per acre. We recommend that only those snags needing removal for safety or fire control purposes be cut.

14-6 In addition to snags, live trees will be needed to provide future snags. Will any provision be made to assure the production of snags to replace those that decay and fall to the ground?

14-7 The FEIS also needs to address the wildlife value of large cull material left after logging and how much of that material and its distribution on a clearcut will be available for wildlife.

14-8 Page 2-47. There is public support in Oregon for a change in management of forestlands. Table 2-22 on page 2-47 shows that a majority of people in Oregon favor increased emphasis on wildlife habitat, hunting and fishing, and hiking and camping on federal lands. The FEIS needs to clearly show if the proposed action will or will not meet public desires as expressed in the survey. We believe that the proposed action does not comply with public desires for the following reasons quoted from the DEIS: "The reduction in habitat use (by elk) must be considered significant and adverse," (page 3-17, 2nd paragraph); "Decreases in mature habitat (116-195 years old) would occur in all alternatives," (page 3-19, paragraph 5); "Commercial thinning removes up to 40 percent of the basal area of the forest and has several effects on wildlife habitat. The structure of the forest becomes more simplified and animal species diversity decreases," (page 3-20, paragraph 2); "Snag-dependant wildlife such as woodpeckers and other cavity dwellers would be adversely affected due to snag removal during harvest operations," (page 3-20, paragraph 6).

14-9 Page 3-6. We are concerned about the impacts of harvesting on very steep slopes and severe fragile soils. Only Alternative 5 will offer optimum protection of those soil types. The DEIS says harvesting on those soil types would increase soil erosion 250 times over natural levels. The impacts on fishery resources are not explained, but, by our estimation, would be severe. The DEIS says "The proposed action and all other alternatives would allow for entry, if unavoidable, on sites containing severe fragile soils."

14-10 The FEIS needs to explain why harvesting on those soils could not be avoided and what would be the consequences to fish if those areas were harvested.

14-11 Page 3-8, paragraph 1. Alternatives to stream crossing on a fragile site should be given.

14-12 Page 3-24. The adverse impacts of precommercial thinning can be mitigated. The thinnings can be piled, shredded or cleared to allow animal passage. The FEIS should discuss how the adverse impacts will be mitigated.

14-13 Page 3-26. Your comments on streamside protection are too general. For example, page 3-26, paragraph 4, states "If buffer strips are maintained as proposed, no impacts on water temperatures are expected." We suggest the more positive statement "Buffer strips will be maintained to prevent increased water temperature."

14-14 Page 3-28. The conclusions listed on page 3-28 are misleading. The first sentence indicates the proposed action and Alternatives three through nine would be beneficial to wildlife. Compared to the no action alternative, the impacts to wildlife may be more desirable, but in comparing the proposed action and Alternatives three through nine to the existing condition, the impacts on wildlife habitat are significant and adverse. It is true that the age diversity of forest cover may increase in the long term, but the value of those vegetative types for wildlife will decrease due to the intensive timber management techniques that seek to eliminate vegetation other than douglas fir. The conclusions on page 3-28 need to be more clearly stated.

14-15 Appendix, page A-5. We have reservations about the use of the Allowable Cut Effect (A.C.E.) in calculating the timber harvest rate. A.C.E is "the immediate increase in today's allowable cut which is justified by expected future increases in yields due to present or proposed management activities." Much of the expected increase in yield is based on the additive effects of fertilizing, thinning, genetic improvement and other techniques known to increase the growth rate of trees. In practice, however, budget constraints have precluded the full application of all beneficial practices. It would seem proper then to adjust the timber harvest rate proportional to the actual rate of yield, instead of the potential. Such an approach would allow greater protection of other resource values that are foregone when those resources are traded off for timber values.

Response to comments in Letter 14.

14-1 The same level of protection provided by the Oregon Forest Practices Act for Class II streams would be provided.

14-2 See text revision for page 3-24, paragraph 5.

14-3 Burning techniques and standards vary site by site. The site specificity requested will be presented in an environmental assessment prepared when the actual sites are proposed for treatment. This generally would occur on a yearly basis.

14-4 Most of the anadromous fish-producing streams in the SYUs produce cutthroat, steelhead and coho, and their generalized habitat requirements overlap. Inventories of those habitats determined streams were producing 50 percent of optimum, measured in grams of salmonids per surface acre. URA, Step 2 of the plan, available at the Salem District Office, provides much greater detail on a stream by stream basis.

14-5 It is recognized that there is a great variability in the streams of the SYUs and that the statement is very general. Much greater detail is available in the URA Step 2. There is no conflict with Table 2-8 since populations can be at any level currently and have a declining or increasing trend.

14-6 Replacement snag and potential snags (green trees) are discussed in the DEIS on page 3-22, paragraph 2.

14-7 Down logs and forest debris are important sources of food and cover for many species of wildlife. The proposed MFP calls for leaving 10 percent of the down woody material for this purpose.

14-8 Public desires as expressed in the survey show a plurality in favor of increased timber production. While the survey suggests that the public favors more wildlife habitat, for example, over more timber production the survey does not permit the conclusion that one alternative would be preferred over another because the relative values (e.g., wildlife habitat vs timber production) are not determined.

Chapter 3, Impacts on Recreation, identifies how the proposed action and each alternative vary in approach and emphasis in meeting recreational needs. Table 1-6 (page 1-25 of the DEIS) also presents a discussion of how the proposed action and alternatives relate to LCDC statewide goal number 8 to satisfy the recreational needs of Oregon citizens and visitors.

14-9 The effects are discussed in the section on fish on pages 3-25 and 3-26 of the DEIS.

14-10 On soils with steep slopes and a high probability of soil movement, entry would usually be avoided. Access across these lands would be considered where soil losses are determined to be less than that resulting from construction of an alternative route. Also, a severe fragile site in the middle of a timber sale unit may be harvested if access to surrounding timber is obstructed.

14-11 Alternatives to stream crossings will be considered on a site by site basis, and environmental consequences addressed in an environmental assessment.

14-12 There are possible mitigatory measures, but due to the costs involved none are planned.

14-13 See text revision for page 3-26.

14-14 See text revision for page 3-28, last paragraph.

14-15 See responses to comment 4-1 and 4-17. Timber sale offering adjustments would be made to coincide with budget constraints.

15

District Manager
Bureau of Land Management
P.O. Box 2965
Portland OR 97221

I appreciate the opportunity to review the Draft Timber Management Environmental Impact Statement for the Westside Salem District. Below I have outlined my major concerns and comments.

15-1 I find no "no harvest" alternative in the Draft. This should be included in the final EIS so that an accurate picture of the impacts of the timber program on non-timber values can be seen.

I support Alternative 5, "strong emphasis on wildlife and other non-timber values", because it best balances a substantial timber harvest with management for other resources.

I fully support the protection of existing stands of old growth forest and management for such stands in the future. This is a wise move given the dependance on these forests by various species of wildlife, including such species as the northern spotted owl and the bald eagle.

15-2 Please define exactly what you mean by "old-growth." I also support the concept of Ecosystem Management and feel that it should be applied to each one of the alternatives.

15-3 I am concerned that you have identified "Areas of Critical Environmental Concern" but have not identified a clear policy for their management.

15-4 Please do so. This also applies to rivers nominated by the National Rivers Inventory as possible Wild and Scenic Rivers and lands proposed as National Natural Landmarks.

15-5 I highly support the development of the Corvallis-to-the-Sea Trail, and I would like to see the Bureau actively involved in the project and outline that involvement in the EIS.

I don't support any use of herbicides on the forest.

Sincerely,
Nancy Peterson
Nancy Peterson
2820 SE Main
Portland OR 97214

Response to comments in Letter 15.

15-1 See response to comment 3-1.

15-2 A definition of old growth has been added to the glossary. See text revision for page G-7.

15-3 See response to comment 13-3.

15-4 The proposed Management Framework Plan (MFP) for the Westside Salem District Planning Area identifies management actions for these areas. Should these areas be designated, activity plans would be prepared to translate management requirements into on-the-ground implementation actions. Further, potential impacts to these areas will be analyzed in the environmental assessments which precede each site specific timber sale. Washington Office Instruction Memoranda No. 80-393, and Oregon State Office Instruction Memoranda No. 81-31, 81-113, 81-166 and 81-279 present additional information regarding the Nationwide Rivers Inventory. Procedures set forth by The National Park Service (NPS) to identify, study, designate, recognize and monitor National Natural Landmarks are found in 36 CFR Part 1212. Washington Office Instruction Memorandum No. 79-541 addresses Bureau cooperation with the NPS regarding Natural Landmark evaluation.

15-5 See response to comment 4-15.

16

WFIA

WESTERN FOREST INDUSTRIES ASSOCIATION
1500 S.W. TAYLOR STREET · PORTLAND, OREGON 97205
TELEPHONE 503-224-5455

September 1, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Re: Westside Salem Draft Timber Management Environmental Impact Statement

Gentlemen:

Western Forest Industries Association (WFIA) appreciates the opportunity to participate in planning for the future of the Salem Westside District. Our Association is comprised of approximately 100 manufacturers of lumber and plywood that share a mutual dependence on Federal timber lands for nearly 100% of their raw material needs. WFIA is deeply concerned about the management direction being taken by the Bureau of Land Management on Western Oregon timber lands. The impact of these proposals on the stability of the timber industry, dependent communities and the economy of the entire state will be substantial. Generally, we believe the Draft Environmental Impact Statement (DEIS) was written in a very biased manner and tends to present data in a way that gives support, or justification, for reducing timber production. Most of our concerns are not new, but have been expressed by the industry time and time again. We were most dissappointed that none of our suggestions or criticisms relative to the Coos Bay Plan are reflected in the Salem Westside DEIS. In our estimation, the DEIS has the following deficiencies:

1. Inadequate evaluation of each alternative with respect to its compliance with the O & C Act and FLPMA.

2. A very misleading account of the true economic impacts of each alternative on the O & C Counties, dependent communities and the timber industry.

3. Inadequate discussion of land use changes, the impact of the shifts in land use and an explanation of how the decisions were made. Also, the economic and physical feasibility of "making up" volume lost to land base withdrawals with massive increases in intensive management practices should be addressed.

4. Incomplete analysis of land withdrawal proposals for spotted owls and other alleged old growth dependent species.

Each of these deficiencies will be addressed individually.

COMPLIANCE WITH O & C ACT, FLPMA

16-1 While the management constraints posed by the O & C Act and FLPMA are addressed on pages 1-1 and 2-28 of the DEIS, the laws are never mentioned in terms of how well each alternative fits the mandate of each statute. On page 1-1, the intent of the O & C Act is described as such:

> "Under this Act, O & C lands classified as timber lands are to be managed under sustained yield principles in order to provide a permanent source of timber supply, watershed protection, streamflow regulation and recreational facilities."

This explanation may be reasonably accurate, but it is not exactly what the law says. The O & C Act actually reads:

16-2 > "...timber thereon shall be sold, cut and removed in conformity with the principle of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating streamflow, and contributing to the economic stability of local communities and industries, and providing recreational facilities." (Emphasis added)

The portion of the law reading "sold, cut and removed" is an important distinction between the DEIS description of the O & C Act and the actual law. On the same page, the portion of FLPMA that gives precedence to the O & C Act in the event of conflicts between the two laws insofar as they

relate to timber management is also addressed. In fact, on page 2-28 this provision of FLPMA is cited as the reason why the BLM is not required to evaluate Wilderness opportunities on O & C lands. Yet, the BLM apparently feels setting aside productive forest land for primitive recreation, exclusive wildlife habitat, visual management or riparian zones is not inconsistent with the O & C Act. The Wilderness designation prohibits timber management. Each of the four land use classifications mentioned here also prohibit timber management. Clearly, the two situations are identical "insofar as they relate to the management of timber resources". However,
16-3 the BLM says the O & C Act conflicts with Wilderness but not with any of several other land use designations that impose identical restrictions on timber management. While not professing to be an attorney, the obvious inconsistency in interpreting the O & C Act in the Westside DEIS needs careful consideration prior to the issuance of a Final decision. WFIA would like to see a thorough analysis in the Final EIS of how well each alternative complies with the O & C Act and the provision in FLPMA establishing O & C dominence. Presently, the legal constraints of the Act are addressed at only two points in the plan, pages 1-1 and 2-28, and are ignored through the remainder of the DEIS.

ANALYSIS OF ECONOMIC IMPACTS

Neither the purpose or validity of Table 3-16 and the discussion relative to it are apparent to our organization. How a ten-year timber management plan and the associated economic impacts relate to a single point in time is of questionable relevance. The table would lead one to believe that a decrease in softwood timber supply of 10 million board feet will somehow create 631 jobs and increase economic activity in the short-term. The logic behind this data escapes us. In trying to assess the reasoning behind this comparison, the only answer we could come up with is that the BLM is attempting to whitewash the severity of the impacts the proposed action will have on the economy. If there is some valid reason for presenting data in this manner, it should be clearly identified in the Final EIS. As the table now stands, a two-year average harvest is compared with a ten-year sale volume to generate the economic impact data. A more accurate estimation
16-4 of impacts is shown in Table 3-17 where present annual sale volume is compared with future annual sale volume. We request that Table 3-16 and any reference to it be stricken from the Final EIS and that economic analyses focus on Table 3-17, instead, as it portrays a more accurate assessment of the expected impacts.

16-5 In regard to the analysis of impacts on county revenues and income generated, we request that the BLM update its cost figures to reflect a more accurate

16-5 stumpage value. The use of $140 produces very conservative, if not misleading estimates of the impacts associated with reduced timber harvest, land withdrawals for wildlife habitat, etc.

ANALYSIS OF LAND USE CHANGES

One of the greatest mysteries surrounding the DEIS is the disappearance of 29,732 acres of forest land from the intensive timber base. The only apparent reference to this acreage is in Table A-2 on page A-4 of the Appendix where it is listed as "MFP Withdrawals". A footnote refers the reader to the District's Management Framework Plan for more information. Because we have been involved in the Salem District's planning process for some time, WFIA knows this nearly 30,000 acres has been proposed for wildlife habitat, primitive recreation, riparian zones, visual management and other non-management allocations. However, we believe very strongly that the displacement of such a large area of land deserves more discussion in the EIS than being simply labeled "MFP Withdrawals". Withdrawing this land from produc-
16-6 tion is clearly a major Federal action that should be thoroughly addressed in the EIS itself, not some referenced document. We request that the Final EIS provide a complete analysis of any proposal to withdraw land from the intensive management base.

WILDLIFE HABITAT

Provisions for preserving old-growth habitat for certain wildlife species under the preferred alternative demand greater explanation and documentation. The DEIS refers to habitat guidelines proposed by the Oregon Endangered Species Task Force (page 3-30) as being influential in the development of the preferred alternative. The guidelines were recently amended and now call for 1,000 acres of old-growth as the necessary habitat for a single pair of spotted owls. Since there is presently only 5,700 acres of old-growth left on the Westside area, one would expect to find less than six pair of owls. Yet, the BLM has found no less than 26 pairs of owls on the planning area. A logical person would think such a circumstance would justify a re-evaluation of the Task Force's guidelines. The Salem District has living, breathing proof that the research done to date on spotted owl habitat requirements may be in error. But, instead of questioning the researchers, the BLM is proposing to more than triple the present old-growth base in order to conform with the guidelines. While this proposal is valuable in destroying the myth promoted by preservationists that old-growth is a non-renewable resource, the reasoning behind the proposal is not presented in the DEIS. If 5,700 acres of old-growth is presently supporting 52 owls, it makes little sense to withdraw thousands of additional acres of productive forest land simply to satisfy some guidelines that have been

16-7 shown to be invalid on the Salem District. The Final EIS should fully explore the necessity of the additional acreage and provide a detailed explanation of any further land withdrawals.

WFIA feels the scope of economic verses environmental impacts are presented in an extremely inconsistent manner designed to support the preferred alternative. In describing economic impacts, for example, the authors of the EIS describe the impact on employment on a county-wide basis for all counties in the EIS area. On page 3-49, the employment impact of Alternative 5, the least timber oriented alternative, is shown for each of seven counties in Northwest Oregon. By comparing the impacts with today's depressed economy, the figures look insignificant ranging from .8% to 0% in terms of the entire economy. By presenting data in this manner, the potential impacts of any alternative on individual communities or unusually dependent areas are ignored. When the DEIS turns to impacts on wildlife habitat, however, the scope of analysis is narrowed to include BLM lands only. In describing the impact of Alternative 1, the most timber oriented alternative, one would get the impression that most old-growth dependent species would vanish if the alternative were implemented. In addition, elk populations would fall to less than 500 animals according to Table 3-9. The text of the DEIS addresses the impact of each alternative on existing habitat on BLM land only. Yet, in the depths of the appendices, on page E-1, a table exists showing that the impact of Alternative 1 on wildlife habitat is virtually identical to that of the proposed action when
16-8 all forest lands in Northwest Oregon are considered. No where is this table referred to in the text of the DEIS. The point here is that the BLM has used two different standards of measure in evaluating environmental impacts. In the case of economic impacts, the entire EIS area is used to
16-9 estimate impacts. Yet, in evaluating the impacts on wildlife habitat, only BLM lands are used in estimating the impact of each alternative. Any such analysis appearing in the Final EIS should be done on a consistent basis.

SUMMARY

WFIA believes the Salem Westside DEIS is extremely inadequate in fully disclosing the impacts of the alternatives and in explaining the reasons behind several of the proposed actions. An analysis of how each alternative fulfills the intent of the O & C Act and FLPMA should be included in the Final EIS as well as an explanation of why Wilderness is not permitted on O & C lands, but primitive recreation, old-growth preservation and visual management withdrawals are. The present comparison of economic impacts with the so-called "existing condition" should be eliminated as it is irrelevant. The reason for withdrawing 29,732 acres of productive forest

land should be fully disclosed and analyzed in the Final EIS. Finally, we believe the BLM has gone out of its way to down-play the significance of the adverse economic impact its plan would have on dependent communities while over-stating the negative environmental impact increased timber production would have on the northwest part of the state. Data in the DEIS is presented in such a biased manner, that an objective decision maker would have a very difficult time arriving at a decision that best satisfies the needs of Oregonians.

Sincerely,

WESTERN FOREST INDUSTRIES ASSOCIATION

Jim Geisinger

Jim Geisinger
Forester

cc: Mr. Bill Leavell
Mr. Joe Dose
Secretary James Watt
Mr. Bob Burford

Response to comments in Letter 16.

16-1 Alternatives which are outside the legal jurisdiction of the BLM must still be analyzed in the EIS if they are reasonable. Thus, the EIS may serve as the basis for modifying laws, congressional approval or funding in light of NEPA's goals and policies. The legal issues raised will be addressed in the Record of Decision (as required, NEPA 40 CFR 1505.2(b).

16-2 The legal requirements for the management of the O&C lands are the subject of an opinion of the Solicitor dated September 8, 1981. A copy of this opinion and the associated Policy Statement of the BLM are included in this FEIS as Appendices H & I. These documents will be used by the BLM in reaching a decision on the Westside Salem Timber Management Plan. An analysis of the basis for the decision will be provided in the Record of Decision.

16-3 See response to comment 16-1.

16-4 The average harvest volume used in calculating the impacts on existing conditions is based on a 3-year period, 1975-1977, rather than a 2-year period. It is not compared with a 10-year sale volume but with the average annual volume of sales (and harvests) expected over the 10 years of the plan. See the text under Impacts on Socio-economic Conditions (page 3-45) for an explanation of why existing conditions are used as a basis for measuring impacts. See the response to comment 11-3 for a discussion of how existing conditions are defined.

16-5 In the calculation of impacts on O&C county revenues, a value of $358.04 per thousand board feet was used. This is the average value of WSSYUs' timber sales during fiscal 1980. Timber stumpage prices have been increasing much faster than general price levels in recent years until 1981. The amount of income generated is primarily dependent on the number of workers employed and their wage levels. Neither of these factors is directly related to timber sales values. The impacts on income (and earnings) are presented in real terms (constant dollars). Wage levels in the timber industry and other affected industries are not expected to change significantly in relation to general price and wage levels.

16-6 There are seven land use allocation alternatives (the proposed action and Alternatives 1, 2, 3, 4, 5 and 10) analyzed in the EIS. All have lands withdrawn from the timber base ranging from 537 acres under Alternative 1 to 70,000 under Alternative 5 (as shown in the following table). The reasons for the withdrawals are identified in the description of the respective alternatives and Appendix B. Comparison of these alternatives provides the analysis of land withdrawals from the timber management base.

MFP Withdrawn Acreage Breakdown by Alternative
(Conifer & Hardwood Lands)

	Alternatives Including the Proposed Action						
MFP Category	PA, 6, 7, 8 & 9	1	2	3	4	5	10
Research Natural Areas	1,625			575	639	1,500	
Visual Resource Management Areas	798			1,437	1,443	7,694	536
Recreation Sites/Lands	1,479			1,006	1,238	11,998	712
Outstanding Natural Areas	355			431	440	600	
Sightseeing Areas	148			144	160	600	
Riparian Zones	9,533			8,334	8,255	9,598	460
Progeny Test Sites 1/	148						
Wildlife Management Areas (Old Growth)	13,753	330	335	2,443	10,560	37,560	
Misc. Protection Areas (Educational sites, additional adverse locations)	1,893	207	127				
Total	29,732	537	462	14,370	22,735	69,550	1,708

1/ No estimates are available for Alternatives 1 through 5 due to limitations of the counting technique used.

16-7 The withdrawal of old-growth forest is for the benefit of many species of wildlife including the northern spotted owl. Appendix D in the DEIS lists those species that have their optimum habitat in old growth. The section on spotted owls has been rewritten to incorporate new information (see text revisions for page 2-23 and page 3-28).

16-8 Appendix E is referred to on the following pages of the DEIS: page 3-16, paragraph 5; page 3-19, paragraph 2. An additional reference has been added to the text revision for page 2-20.

16-9 In the evaluation of impacts the area of influence may vary due to the nature of the impact. The economic impacts generally do not occur on BLM lands but affect the people living in the local area. The impacts to wildlife on all lands can be found in the DEIS by comparing wildlife habitat requirements as shown in Appendix D with habitat structure on all lands in northwestern Oregon as shown in Appendix E.

August 30, 1981

Salem District Manager
% EIS Team (922)
BLM
Box 2965
Portland, Oregon

17

Gentlemen:

I have some comments on your Westside Salem Timber Management DEIS which I would like to bring to your attention.

I strongly favor avoiding harvest and road building in areas of steep slopes and fragile soils.

I favor alternates that would have the least effect on animal and fish life.

I favor stronger efforts in clearcuts after or between harvest by use of large boulders where available, cutting of

trenches across the roads or where necessary obliteration of the road for whatever distance may be required.

Sincerely,

John W Day

Executive Department

155 COTTAGE STREET N.E., SALEM, OREGON 97310

VICTOR ATIYEH GOVERNOR

September 1, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR. 97221

Dear Sir:

RE: Westside Salem Timber Management
PNRS 8107 4 370

Thank you for submitting your draft Environmental Impact Statement for State of Oregon review and comment.

Your draft was referred to the appropriate state agencies. The Departments of Soil & Water, Forestry, Parks, Land Conservation and Development and Fish & Wildlife offered the enclosed comments which should be addressed in preparation of your final Environmental Impact Statement.

We will expect to receive copies of the final statements as required by Council of Environmental Quality Guidelines.

Sincerely,

INTERGOVERNMENTAL RELATIONS DIVISION

Kay Wilcox
A-95 Coordinator

KW:cb

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE , Salem, Oregon , 97310
Phone Number: 378-3732

PNRS STATE REVIEW

Project #: 8107 4 370 Return Date: 8-21-81

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

( ) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

(X) No comment.

Remarks

Westside Salem BLM
Draft EIS
timber mgmt

Agency SHPO By

NOTED
L GILSEN

OREGON PROJECT NOTIFICATION AND REVIEW S

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE , Salem, Oregon , 97
Phone Number: 378-3732

PNRS STATE REVIEW

Project #: 8107 4 370 Return Date: 8-21-81

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

(X) The environmental impact is adequately described.

( ) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

Please see the attached sheet for additional comments.

Agency Soil & Water By

WASHINGTON COUNTY

Soil and Water Conservation District

RECEIVED
AUG 14 1981
STATE SOIL AND WATER CONSERVATION COMMISSION

257 WEST MAIN STREET
HILLSBORO, OREGON 97123

August 7, 1981

Mr. Charles V. Liles, Director
Soil and Water Conservation Commission
1015 - 13th Street S.E.
Salem, Oregon 97310

Subject: Westside Salem Timber Management Plan

Dear Chuck:

We find the Westside Salem Timber Management Draft Environmental Impact Statement very well done and more than adequate for the needs.

We hope the final plan will be flexible enough to fit the demands of the economy as those demands change according to business cycles.

Our choice for the final plan is full timber production (1900 MM board feet annually).

Very truly yours,

Ralph Duyck

Ralph Duyck, Chairman
Washington County SWCD

RD:rmk

Response to comments in Letter 18.

18-1 See text revision for page 2-24, seventh paragraph and page 2-25. Pages 3-32 through 3-34 in the DEIS discuss potential impacts to these rivers.

OREGON PROJECT NOTIFICATION AND REVIEW SYSTEM

STATE CLEARINGHOUSE

Intergovernmental Relations Division
155 Cottage St NE Salem, Oregon, 97310
Phone Number: 378-3732

PNRS STATE REVIEW

Project #: 8107 4 370 Return Date: AUG 21 1981

ENVIRONMENTAL IMPACT REVIEW PROCEDURES

If you cannot respond by the above return date, please call to arrange an extension at least one week prior to the review date.

ENVIRONMENTAL IMPACT REVIEW
DRAFT STATEMENT

( ) This project has no significant environmental impact.

( ) The environmental impact is adequately described.

(X) We suggest that the following points be considered in the preparation of a Final Environmental Impact Statement.

( ) No comment.

Remarks

The only reference to Scenic or wild rivers is a reference to the inventory maintained by Nat. Park Service (N.C.R.S.) on proposals. The State Scenic Waterways program has inventoried five (5) Drainages for potential study:
The Nehalem
Trask
Nestucca
Siletz
Alsea.

18-1 We feel that the impacts of the alternatives should address these resources and the State Scenic Waterway Program

Agency Parks By ALAN Cook 378-6378

Phone (503) 829-9131 Main Office
Phone (503) 829-2341 Sales Office

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MOLALLA, OREGON 97038

19

September 2, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
Portland, Oregon 97221

Dear Sir,

I recently attended the public hearing on the Westside Environmental Impact for the Salem District of the Bureau of Land Management. I would like to make a few comments concerning the proposed plan.

19-1 The draft appears to be in conflict with the O & C Act of 1937 in several areas, most notably in timber production. The Act specifies that timber is to be managed for "... the stability of local communities and industries." Within the past few years Champion International, Hobin Lbr. Co. and I.P. Miller have all closed their mills in the westside planning area, due, at least in part, to lack of raw materials - i.e. timber sales and logs. Other mills in the area are facing the same fate. Yet, the BLM proposes to further reduce the available raw material supply. I fail to see how further reductions in the allowable cut will increase community stability as more mills shut down. This action seemes contrary to the wording of the O & C Act.

The arbitrary decision of the BLM to preserve 11,800 acres of old growth timber is in direct conflict with the Act. Nowhere does the Act address itself to the management of wildlife habitat either directly or by inference. The EIS would lead me to believe that without old growth timber, all elk and spotted owls in the area would soon become extinct. But no evidence is presented to support this idea. I can not believe that these two species will be so severly impacted if the old growth is harvested. There are more than enough riparion zones, visual resource areas and buffer strips already protected and preserved in the plan. This old growth could also support a number of mills. As you know, a sawmill is designed for a specific size log. Any mill designed for large old growth logs and relying on the BLM for its timber supply will be hard pressed to continue operations without this BLM old growth. Avison Lumber Co. is just one such mill. Many of our products must be cut from old growth timber. Most of our lumber is now being exported to Japan and Australia as a finished product. But these products must be cut from fine grain, old growth type logs - lumber cut from second growth does not meet the quality requirements. There is no substitute for the quality old growth log. The proposed BLM plan will lock up this remaining old growth and simply allow it to rot into the ground.

19-2 In reviewing the EIS, I did not find an economic analysis concerning the spotted owl. What is the estimated value of 11,800 acres of old growth?

Without this knowledge how can a land manager decide which is more valuable? If this information is in the EIS, it is quite will camoflagued!

The unemployment tables shown of page 2 - 37 are misleading. It is a recognized fact that the timber industry is in the midst of a recession. And the recession has deepened in the past year. But the BLM chose a base period of January, 1980 (the start of the recession) and compared if to January, 1981 (the middle of the recession). Of course the figures show a rise in unemployment! My ten year old son could tell you that! These figures do not indicate a general trend in the industry. A longer base period of several years should be used before any conclusions can be drawn. 19-3

It is obvious that a lot of time, effort and money has gone into the preperation of this EIS. However, for all this work, I feel that the BLM has already selected its course of action. I have attended the public hearings and scoping meetings as well as personally talking with many BLM employees. My overall impression is a negative one. I feel that this process is just a sham, a requirement to be fulfilled by the bureaucracy, I really doubt that by objectionswill be considered. But "hope springs eternal", and I hope that my comments might stir someone to question the basic assumptions that went into this EIS.

Thank you.

Sincerely,

MICKEY BELLMAN
Forester

Response to comments in Letter 19.

19-1 See response to comment 16-2.

19-2 It is estimated that the reduction in spotted owl habitat in Alternative 3 (Emphasize Timber) from the amount proposed under the proposed action would provide an additional 2.2 million board feet in annual timber harvest. This represents a total of 54 jobs and about $590,000 annual income in the local area.

19-3 The data on changes in wood products employment and unemployment were included to show the most recent information on local economic conditions. It was not meant to show any trend in the industry except that declines in wood products employment were associated with increases in total unemployment during the most recent 12-month period. It was not used as a base for impact analysis.

20

MID WILLAMETTE VALLEY
COUNCIL OF GOVERNMENTS

COG FILE #: DFD-01322

September 3, 1981

Phillip C. Hamilton
USOI, Bureau of Land Management
P.O. Box 2965
Portland, OR 97208

SUBJECT: A-95 REVIEW OF WESTSIDE SALEM TIMBER MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

The Clearinghouse staff of the Council of Governments has completed its review of the Environmental Impact Statement.

Your Environmental Impact Statement was made available to appropriate local agencies for review, but we received no comments. Therefore, we can assume that the Statement is consistent with comprehensive planning, and local plans, programs and objectives and no significant conflicts have been identified. A complete list of those who received a copy of your Statement is attached.

Thank you for the opportunity to comment on this Environmental Impact Statement.

Sincerely,

Sue C. Hollis
Clearinghouse Coordinator

SCH/lw

Attachment

cc: Kay Wilcox, State Clearinghouse Coordinator

PROJECT TITLE: WESTSIDE SALEM TIMBER MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT

APPLICANT: Bureau of Land Management

Date Received: July 13, 1981

ENVIRONMENTAL IMPACT STATEMENT MADE AVAILABLE TO THE FOLLOWING:

Polk County Board of Commissioners
Jim Owen, Polk County Department of County Planning
Yamhill County Board of Commissioners
Yamhill County Department of Planning and Development
Marion County Board of Commissioners
John Elegant, Office of Salem City Manager

MEMBER AGENCIES:
COUNTIES: CITIES:
SPECIAL DISTRICTS:

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION X

1200 SIXTH AVENUE

SEATTLE, WASHINGTON 98101

21

REPLY TO ATTN OF: M/S 443

SEP 2 1981

Edward G. Stauber, Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P. O. Box 2965
Portland, Oregon 97221

RE: Westside Salem EIS

Dear Mr. Stauber:

We have completed our review of the subject draft EIS. Generally the EIS presents a good analysis of potential impacts within EPA's areas of jurisdiction and expertise, primarily water and air quality. A good range of alternatives is analyzed. Mitigation measures developed through the project planning process are adequately discussed.

According to the EIS, the five-year timber sale plan shows several activities occurring on areas of fragile soil near streams with important fish habitat. For example, page 3-25 mentions four miles of new road construction with one stream crossing in such sites. Page 3-8 mentions fifteen clearcut units in such areas. Apparently the erosion estimates on page 3-6 do not take these disturbances on such fragile sites into account, and thus may be underestimates. EPA is concerned about potential water quality and fisheries impacts of such activities. We recommend that disturbances of these fragile sites should be avoided if possible. Where absolutely necessary, extreme care should be taken to minimize impacts. 21-1

We believe Alternative 4, utilizing an ecosystem management approach, may be the most balanced alternative. We do support the reduction in environmental impacts from past conditions represented by the proposed alternative.

The Environmental Protection Agency has rated this draft statement LO-1 (LO - Lack of Objections; 1 - Sufficient Information). This rating will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act, as amended.

Thank you for the opportunity to review this environmental statement. If you have questions or would like to discuss these comments, please feel free to contact me at (206) 442-1285 or (FTS) 399-1285.

Sincerely,

Elizabeth Corbyn

Elizabeth Corbyn, Chief
Environmental Evaluation Branch

Response to Comments in Letter 21.

21-1 Erosion estimates were made using the sample 5-year timber sale plan as a model for the road construction during the decade considered. The sample plan indicated about 10 percent of the new roads would be on fragile and/or steep slopes. That information was factored into the calculation. But, as stated in the DEIS, each new road site will be looked at individually in an attempt to avoid situating the road where failure would be certain.

22

Umpqua Valley Audubon Society

P.O. Box 381, Roseburg, OR 97470

September 2, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Mr. Richard Bonn and members of the EIS team,

The following is our comment on the Westside Salem Draft Timber Management EIS.

We support Alternative 5, and related proposals that would establish an "ecosystems approach" and provide for at least 37,600 of the districts 244,059 acres (or 15%) to remain in, or be allowed to regenerate into, the mid-age and old growth age classes in perpetuity. According to various wildlife biologist's recommendations we ask that approximately 2/3 of these lands to be in at least 80 acre blocks, and the remaining 1/3 to be in continuous 640 acre sections.

Of the 462 kinds of vertebrate wildlife species found in western Oregon, over 300 are associated with forested habitats. Furthermore, about 30 secondary hole nesting birds are dependent on 14 primary excavators. Using the "life forms concept", Jack Thomas, in Wildlife Habitats In Managed Forest--The Blue Mountains of Oregon and Washington, 1979, maintained that the greatest number of forest wildlife species were oriented towards the mature and old growth successional stages.

According to Habitat Diversity For Wildlife On BLM Managed Lands in Western Oregon, prepared by the Portland BLM staff in 1980, "Optimum wildlife habitat diversity would require 25 to 40% of the forest be maintained in older successional stages." We believe the 15%, generally recommended in Alternative 5, to be the absolute lowest acceptable minimum! Anything other than Alternative 5, particularly Alternatives 1, 2 or 10, would result in the continued fragmentation and isolation of the older age classes of forest, and would serve to minimize the effectiveness of stream buffers and necessary riparian zones. Thus vital travel lanes and migration corridors used by wildlife would be distrubed or destroyed.

Again, anything approaching Alternatives 1, 2, or 10 would be unacceptable as they would "result in relic, nonviable populations of native wildlife disjunct by large distances" (Habitat Diversity For Wildlife On BLM Managed Lands In Western Oregon, 1980).

22-1 BLM administered lands should be managed to compensate and to correct for habitat deficiencies (or total lack of habitat) on surrounding private lands. We further request that the BLM begin to give full consideration to alternative harvest techniques which have shown to be viable alternatives to the present clear-cut methods of forest harvesting. Specifically we are referring to professional foresters such as Orville Camp, President of the Illinois Valley Small Woodlands Association, and Mr. Richard Smith, Consulting Forester and President of Woodland Management Inc., Portland. Both individuals have shown it is economically practical to selectively harvest the forest on a sustained annual basis without obliterating the various microclimates that make up the character of the forest, and to which a wide variety of plant and animal life depends.

The OSU Extension Service has published a description of the methods of Mr. Orville Camp, who owns and manages a multi-species, uneven-aged forested acreage near Selma, Oregon. Mr. Camp's managment methods include a management system in all age classes, and all species, thus retaining a more natural environment. Mr. Camp does not remove anything, "unless I have something to take its place." A tree is selected for harvest when it begins intercepting sunlight from the smaller trees. On south-facing slopes, however, hardwoods are often used to provide a better environment for Douglas Fir as seedlings there often need the cooler microclimate provided by the hardwoods in order to survive.

Water courses are carefully considered to prevent erosion problems or significant changes in water runoff areas. Fish can reproduce naturally. Mr. Camp's road system is spaced at intervals so trees can be removed without getting off the main road. He does not use skid roads because of the problems they create. Trees are pulled to a main road and picked up by a truck at a convenient location along the road. His basic road system is "based on a 12' road base, thereby not significantly removing the forest potential with roads."

Mr. Richard Smith, whose firm manages 40,000 acres of private timber tracts in Oregon, Washington and Northern Califonia, operates basically the same. Both men claim they will make more money because each tree grows to maturity. To quote Mr. Smith from an article that appeared in the March 20, 1981, issue of the Capitol Press (Salem, Oregon), "We want to harvest growth without destroying the forest. We're not damaging the forest to gain an income."

Neither man's methods employ the use of herbicides, pesticides or chemical fertilizers as seen in "crisis management" approaches of the majority of your proposed alternatives. "Severe thinning and clear-cutting destroys duff and the forest floor," Mr. Smith explains

in the Capitol Press aritcle. "The forest floor doesn't retain moisture, so nature starts back with weeds and vines that grow faster than seedlings. Then you have to spray."

The burning of slash has virtually been eliminated in both forests because large wood pieces are used and the balance is left for mulch to dacay and return materials to the soil. Besides the undesirable effect that slash burning has on air quality, it can result in destroyed timber when fires get out of control.

Mr. Camp's and Mr. Smith's systems and timber policies are made on a one-to-one basis by the woodland manager of a particular area and not on a map in a conference room where individual site requirements might be overlooked. Mr Camp states that BLM has enough personnel for about one person for each 2,000 acres they manage. In his opinion this "appears about right for the size parcel that could be managed by one person." In the OSU Forestry News Notes, January, 1981, Mr. Camp continues: "If each person was assigned a parcel and was able to live on that parcel as most foresters would like, then we would have competition among the Government Foresters. That parcel would most likely produce several times the present harvest level and could address everything I have talked about." (e.g. the highlights of which have been included in this letter).

Again, the effect of these management techniques has proven to be economically attractive with a sustained profit from both operations.

22-2 Mr. Smith's tract produces 1100 to 1200 board feet per acre in new growth each year. Comparing this with the 206,788 acres of commercial Westside Salem BLM tiber land which is producing 156 MMBF annually, this computes to about 754 board feet per acre per year. With a projected 22% reduction in ofrest harvest levels for Western Oregon by the year 2000, we question if even this annual 146 MMBF will be sustained under the "Proposed Action" as outlined with the various Alternatives on Table 1-2 of the EIS. These figures in excess of 100 MMBF are, and have been, largely dependent on the continued and past liquidation of our old growth forests, and the adoption of "crisis management" methods of using herbicide sprays which have not stood the test of time. Although accelerated old growth liquidation has produced immediate economic gains, only through Nature's way (which has stood the test of time) will we be provided with a stable, natural, and economic environment.

Our federal agencies should have the courage to adopt timber practices that will supply commercial timber needs with less damaging impact to our soil, watershed, and basic forest ecosystem. These practices must sustain the timber needs of future generations of both people, and old-growth-dependent widllife.

Under laws requiring a sustained timber yield, BLM should resist the pressures of the timber industry which have ignored the successful models as exemplified by such foresters as Orville Camp and have advocated the strip mining of our timber resources. Many current timber practices have been perpetrated as being scientifically sound and good forest management, but actually may result in creating areas that cannot be immediately returned to commercial production even with the use of herbicides or other "crisis management" approaches, as even you have acknowledged would be the result of Alternative 1.

In addition to desiring a truely sustained timber production, compatible with wildlife dependent on old growth coniferous forests, we support the protection of all known cultural resources and botanical resources classified as sensitive, threatened or endangered. As described under BLM Instruction Memorandum No. OR-81-362, we ask that you not only respect the mandatory list of sensitive species as listed under "Part 1. Federal taxa" but also protect the "optional" sensitive species as described in "Part 2. Oregon Interim State taxa".

Furthermore we would like to express our support for the 15 A.C.E.C. nominations as outlined on Table 2-12 of the EIS, as well as the protection of Table Mountain as a National Natural Landmark.

22-3 We ask that you further address what impacts any timber production decision would have on the 6 potential National wild, scenic or recreation rivers as identified by the N.C.R.S. and also the Corvallis-to-the-Sea Trail. It was not established in the EIS's brief mention of the Corvallis-to-the-Sea Trail, for example, as to what your agency's policies would be in protecting or enhancing the scenic values within the BLM portion of the 22 miles that cross public lands. As such recreational trails are greatly needed in Oregon's coastal forests, we ask that no timber management policies be pursued that would compromise the trail, the potential Scenic Rivers, or Table Mountain's current scenic integrity and future recreational advantages.

BLM's authority to carry out Alternative 5 recommendations is clearly mandated under FLPMA and BLM Manuals 1602, 1603, 6500, 6602, 6740, and 6840. We also believe the recreation proposals and A.C.E.C. proposals under Alternative 5, and the Westside Salem District's ability to cut 99 total MMBF per year, to be highly consistent with the O & C Act's provisions which require that the land "shall be managed...for permanent forest production,...providing a permanent source of timber supply, protecting watershed, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities." (43 USC 1181a).

Sincerely,
Board of Directors Umpqua Valley Audubon Society

Response to comments in Letter 22.

22-1 During site specific timber sale planning, relevant alternative timber harvest methods would be given full consideration. Their merits and environmental consequences would be addressed in the environmental assessment. Timber harvest methods considered range from horse or tractor skidding, to cable systems (highlead or skyline), to aerial systems (balloon or helicopter).

22-2 The growth figure shown applies only to Alternative 10. The board foot volume produced by a stand is dependent upon species type, stand age, acreage distribution, stocking density, site capability plus expected response from intensive treatments. Although the proposed action would make 834 board feet per acre per year available for harvest during the proposal period, upon the forest reaching regulation, the growth would be 1,024 bd. ft./acre/year.

Each alternative and respective cut level is expected to be sustainable for at least 400 years. See the discussion, The Allowable Cut Computation, in Appendix A.

22-3 See response to comments 15-4 and 18-1. Potential impacts to these rivers and mitigation measures will be analyzed in the site specific environmental assessments which precede each timber sale.

23

INDEPENDENCE DIVISION
MOUNTAIN FIR LUMBER CO., INC.
P.O. BOX 218 / INDEPENDENCE, OREGON 97351 / TEL. 503-838-0550

DOUGLAS FIR LONG-DIMENSION LUMBER

September 3, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Sir:

This letter is to comment on the Draft Environmental Impact Statement for the Salem Westside District.

Mountain Fir Lumber Company, Inc., depends heavily upon Federal timber for its raw material needs. Your preferred alternative reduces current harvest levels and withdraws productive forest lands from timber production. This proposed action is simply not acceptable.

I believe the Bureau of Land Management has a moral obligation to adhere to the requirements of the O & C Act to manage these lands for optimum timber production to maintain community stability and to provide revenues generated from stumpage receipts to the O & C Counties.

Maximum timber production should be the most important priority in the management of the Salem Westside District.

Very truly yours,

David E. Ivanoff
Division Forester

DEI:ndc

24

ASSOCIATED OREGON LOGGERS, INC.
AUTUMN HOUSE
1077 GATEWAY LOOP
SPRINGFIELD, OREGON 97477
(503) 746-4311

F.F. "Monte" Montgomery
President

September 3, 1981

Joe Dose, District Manager
Bureau of Land Management
Box 3227
Salem, Or 97302

Dear Joe:

Thank you for the opportunity to comment on the sufficiency of the Westside Salem Draft EIS. We hope these suggestions prove useful in developing the final statement.

1) Departure from Interior non-declining yield policy. The DEIS states that, "there is no surplus inventory, thus none can be made available for accelerated harvest in accordance with Departmental policy" (p. xiii). Within the constraints imposed by the policy this may be true, but the option of deviating from policy may be worth analyzing. Specifically, an analysis of timber schedules, on a variety of land allocation alternatives, which do not have long-run sustained yield capacity as a ceiling or the non-declining yield level as a floor may prove more responsive to projected timber supply shortages than are the alternatives presented in the draft. 24-1

We recommend an analysis of economic regulation options. Specifically, such an analysis would determine the amount of timber that one should harvest in each period that will maximize the present net worth of timber harvests over time. This type of analysis is quickly performed with the aid of the SIMIX allowable cut model and some knowledge of the demand/price relationship in the local area (available from the Forest Service PNW station).

Either Dr. Doug Brodie or Dick Barber at OSU would be willing to provide technical assistance; as would the AOL staff. This analysis would determine, in economic terms, the best timber management strategy for the planning area. Please let us know your thoughts on this option.

2) We have reservations about the legal adequacy of the MFP preferred alternative land allocation in relation to the O & C Act. We hope the final statement will incorporate any changes necessitated by the forthcoming legal opinion on this matter. 24-2

AFFIRMATIVE ACTION ~ EQUAL OPPORTUNITY EMPLOYER

The following technical comments are offered:

3) Wildlife management:

a) On Page 3-16, it is stated that "certain species of vertebrates are associated with forests that are of a particular age class and resulting structure. Some species habitat requirements are rigid, others are more flexible." Appendix D has a thorough list of species/habitat associations, but detail on the relative habitat requirements of species is omitted. 24-3

This might be useful information to a decision-maker attempting to assess the trade-offs of different wildlife management strategies. We encourage the Bureau to include this information in the final statement.

b) On Page 3-17, the Bureau assumes that "(adjacent mature and old-growth stands) are currently at carrying capacity." What evidence is there to support this assumption? Is it true for all species which are found in older habitats? 24-4

4) The Management Framework Plan (Oct. 1981). The MFP preferred land allocation alternative forms the basis for the majority of the DEIS alternatives. Therefore, we are taking this opportunity, presented by the NEPA process, to comment on the PA land allocation.

a) The allocation of 169,642 acres to timber production lacks a conclusive rationale. On Page 15, it is stated that the "acreage allocations to timber production and to retention of other resource values would provide a reasonable balance between competing forest land uses." In contrast, the rationale for the water management program (p. 20) is that "the preferred alternative represents a concerted attempt to comply with . . . a considerable body of law, policy and guidance which has been developed." Does the timber production allocation also represent an effort to comply with law? We believe it is the responsibility of the Bureau to manage its land in a professional and legal manner; which may, or may not, be a "reasonable balance". 24-5

b) The MFP document makes no mention of the legal and administrative responsibilities of the Bureau. Perhaps a legal review of the MFP PA would be appropriate prior to the final statement.

We hope our comments will be of some help as you move towards a decision. Please contact us if you wish any clarification.

Sincerely,

Andy Stahl

Andy Stahl
Forest Planner

cc: F. F. (Monte) Montgomery

Response to comments in Letter 24.

24-1 In Westside Salem, it does not appear that departure from the non-declining policy would, in fact, be more responsive to projected timber supply shortages. Table 2.3 in Forestry Program for Oregon (1977) describes the harvest objectives from BLM lands in Westside Salem which would minimize projected timber supply problems. This source indicates peak production is needed after the year 2000.

The question of economic regulation options has been looked at in the past. Economic regulation would provide harvest volumes that closely parallel the cyclic nature of the demand curve. Allowing harvest levels to vary in this manner would make it impossible to maintain the intensity of the program because investment levels for intensive management practices are provided by BLM's share of annual receipts. The long-term nature of many of these investments requires a relatively stable level of funding. In addition, harvest levels which vary cyclically would greatly increase the difficulty and uncertainty of budget preparation by the O&C Counties.

24-2 See response to comment 19-1.

24-3 The key was inadvertently omitted from Appendix D. See the revised text for Appendix D, pages D1-D7. Now, using Appendix D, habitat requirements by species can be determined.

24-4 Data on species densities are not available, therefore a basic assumption used in this analysis is that all habitats are at carrying capacity.

24-5 See response to comment 19-1.

25

4094 Lucille Ave. SE
Salem, OR 97302
September 7, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

Dear Mr. Bonn:

SUBJECT: Commentary on Draft Timber Management Environmental Impact Statement.

First, I must respond to those who spoke in support of maximum timber cutting at the August 25 hearing in Salem. The speakers and those they represented don't seem to realize that their greatest enemy has been and continues to be the private sector-particularly the large timber corporations that have historically overcut their lands, refusing to operate on a sustained yield basis.

John Beuter, in his report Timber for Oregon's Tomorrow, prepared by Oregon State University for the State Department of Forestry, clearly forecasted that if the private timber companies continued the rate of cutting that they were engaged in at that time (1976), by the year 2000 there would be a decrease of 22% in Oregon's timber production (40% in the Eugene unit watershed). The cutting continued because, as one apologist for the timber industry responded recently under questioning on the radio "...the private sector was in a position to respond quickly to the marketplace". In other words, the big timber companies cut strictly for quick profit without a single thought of the future welfare of timber-dependent communities, or more than a token effort toward reforestation. Representative Jim Weaver reported in 1977 that 38% of privately owned forestland was either poorly reforested or unstocked.(Salem Statesman-Journal, July 9, 1977.)

Log exporting by the private companies has also played its ugly role. The Stanford Research Institute Report of 1974 forecasted that if log exporting was allowed to continue, there would be a reduction of 36% in logs available for U.S. processing by the year 2000 (p.79). The Report conceded short term economic gain but long-term economic and environmental disaster. Representative Jim Weaver, during the last Congress, again attempted to plug the loopholes in laws effecting log exportation but was unable to do so in the face of timber corporation lobbying.

The same persons who testified demanding intensive forest management on public lands, citing the O & C Act and O & C county revenue as justification, are the natural consequences of the prior irresponsible behavior of the private sector, in which they themselves may have participated.

The BLM and other federal agencies have the grave responsibility to see that the resources belonging to all of us are used and maintained wisely for the greatest benefit to all, and the O & C Act endorses that concept. For that reason, Alternative I in the EIS should never have been developed and will be legally challenged if its philosophy is adopted as the Preferred Alternative. That Alternative serves only short-term timber interests that can use it as a baseline, making any less radical Alternative appear as a great compromise on their part. I do not believe that any responsible timber company would even suggest that Alternative.

I challenge that the BLM is safeguarding public interest by developing a Preferred Alternative in which 31% of mature trees will be forever lost within ten years (Table 3-7). The consequences of this action, along with the adoption of a sixty year horizon, are shocking--THIS WOULD FOREVER REDUCE THE DIVERSITY, BOTH PLANT AND ANIMAL, OF THE FORESTS, AS THERE WOULD NEVER AGAIN BE A NATURAL SUCCESSION IN THE FORESTS!

Figure 3-1 depicts the intended enormous increase in pre-commercial and commercial thinning. Since 41% of the areas entered are scheduled
25-1 to be logged by tractor and ground lead yarding systems, three entries within a sixty year period will have adverse consequences of soil compaction, intensified erosion, and loss of nutrients.

I am concerned that a sixty year horizon is adopted in the PA when a seventy year rotation is recognized as the horizon bringing the forests most quickly under management, while the seventy year horizon itself appears to ignore the multiple-use concept provided for in the O & C Act. I see this as capitulation to timber industry pressure and not in the best interests of most people, plants or animals. Young forests (16-115 year old stock) comprise 69% of BLM managed forests, and this percentage is increasing, though this habitat contains the lowest plant and animal diversity (Tables 2-6, 2-7).

I am concerned, too, that 48,000 acres of Northern Spotted Owl habi-
25-2 tat has been removed from proposed ACEC's. I question the legality of such reduction when it would reduce a threatened species population from twenty six pair to but one.

I am also concerned about the projected road building program. On page 3.4, "...moderate hill slopes with average slopes of from 30 to 40%...exhibit deep rotational slumps and mudflows."- yet 10% of the roads and 12% of the clearcuts in the next five year timber plan will be made in steep areas (70-100% gradient slope). Erosion will be a major problem; we need the soil, and we must protect both the quality and quantity of our water.

Of course we are all concerned about economics and jobs. I don't believe there are any easy answers, but there are facts to keep in mind while we are trying to forecast the future in these terms:

1) The greatest long-term benefit to the O and C areas would be a sustained-yield forest, offering long-term, stable employment and a consistent reimbursement to the O & C counties.

2) Mills have been closing for the last years, not from a lack of logs but from the lack of a market for the lumber; timber companies are defaulting or requesting extensions on logging contracts.

3) If interest rates eventually come down and building resumes, the style of family home will be different. We will find smaller houses being built and more multiple-unit dwellings that utilize concrete as the basic building material.

4) Our national population is declining steadily and the percentage of poor is steadily increasing; both factors in planning future housing needs.

5) Excess packaging is being reduced and more plastic is being utilized.

6) Oregon is changing; becoming more urbanized and populous. Our economic base is broadening; timber production is now not the only use we find for our forests. Many of the new jobs are in electronic parts manufacture utilizing unskilled or semi-skilled labor and one of these plants will be built near Lebanon,located in an O & C county.

Reduction of timber production is inevitable. Areas of new employment can be found in some of our new industries, or in services associated with them or the increasing population; in a stepped up reforestation, thinning, fertilization forest management program; in new sports and recreation jobs increasing in forested areas. These can all serve to cushion the dislocation as Oregon changes from a "timber only" to a "multiple-use" state.

Since recreation has been given only minimal attention in the past on BLM lands, maximum emphasis should be given to bring this aspect of the forests into balance within the multiple-use concept. I particularly urge that the Corvallis to the Sea trail be developed. There will be ever increasing pressure for all kinds of recreation as Oregon's population continues to climb. As is pointed out (p.3.56), the majority of the ever-increasing population of the Willamette Valley considers other uses of the forest more important than increased timber production.

I have shared some of my concerns with you. They lead, not to one particular Alternative, but to requests that I think are important:

1) Maintenance of all old growth acreage.

2) Maintain the broadest diversity of plant and animal life possible within the chosen Alternative.

3) Allow no less than a seventy year rotation.

4) On slopes above a 40% gradient widen stream buffers to protect streams from mass erosion and avalanche torrents.

5) No cutting on lands unable to maintain sustained yield.

6) Close, constant supervision of herbicide use.

7) Close logging roads as soon as possible; those maintained close to ORV use.

8) Make every effort to assist those attempting to close the loop-holes in our log export laws.

The Preferred Alternative rates very poorly in ecosystem management; has low positive consideration for recreation, and negative impacts on cultural and visual resources; areas of critical environmental concern, and other special areas.

My greatest hope is that the BLM will act within the wisest limits of stewardship in determining the final Alternative.

Sincerely,

Catherine Olcott

Catherine M. Olcott

Response to comments in Letter 25.

25-1 See response to comment 4-4.

25-2 Methods other than ACEC designation would be used to protect spotted owls under several alternatives. Due to the widespread distribution of spotted owls in the Coast Range, the habitat areas did not meet the criteria of importance which is required for ACEC designation.

September 4, 1981

26

Salem District Manager
Bureau of Land Management
PO Box 2965
Portland OR 97208

COMMENTS ON THE WESTSIDE SALEM DRAFT TIMBER MANAGEMENT ENVIRONMENTAL IMPACT STATEMENT: CORVALLIS TRAIL COMMITTEE

We support Alternative 5. We feel that Alternative 5 represents the best balance of management for the timber resource with management for the other forest resources such as recreation, wildlife, watershed, fisheries
6-1 and cultural resources. We also feel that a "no harvest" alternative should be included as it would allow for the best analysis of the timber harvest program on the other resources.

GENERAL RECREATION
Future Developments:

The Draft EIS is very vague in its discussion of the future recreational opportunities on the district. The preferred alternative is supposed to increase opportunities. How will this be accomplished? What specific projects are planned, and how will they be funded? What percentage of your
6-2 budget will be spent on recreation? Priorities should be outlined in the EIS. Specific details of your plans to maintain existing recreational opportunities and facilities should also be in the EIS. How many miles of hiking trails are now maintained on the district? Do you plan to increase that mileage? By how much and when?

Impact of Timber Program:

What are the expected impacts of the various alternatives on specific
-3 recreational opportunities, i.e., existing campsites, trails, views, primative experiences, and opportunities for solitude?

Primitive Recreation:

A large percentage of the discussion of recreation in the Draft EIS involves ORV and other road related forms of recreation. You should also include a discussion of primative recreational opportunities. Where
-4 exactly are there opportunities for primative recreation, which includes a substantial departure from the works of human beings (roads, logging operations, motorized vehicles) and offers such qualities as solitude, quiet, long-range hiking, and submission to the undisturbed forces of nature?

CORVALLIS-TO-THE-SEA TRAIL

We feel that the discussion of the Corvallis-to-the-Sea Trail is inadequate. The Corvallis Trail Committee and the BLM have had numerous discussions about the trail since 1977. The Bureau has been involved in
-5 determining proposed trail location, approval of flagged routes, and integration of the concept of the trail in district planning. The EIS should include a discussion of the BLM's specific role in the future planning, development and maintenance of the trail.

26-5 The impacts of the timber program on both existing and planned sections of the trail need to be discussed in the EIS. Guidelines should be outlined which clearly define how trail that is impacted by timber harvest activities will be re-routed or reconstructed.

ECOSYSTEM MANAGEMENT

We support the concept of Ecosystem Management because it represents the wisest and best management of the forest for sustained maintenance of all the forest resources. We support the maintenance of the few remaining stands of old growth and management for old growth in the future. Old
26-6 growth forest does, however, need to be clearly defined in the EIS so we know what exactly you are managing for. (Hopefully it will correspond with our definition).

SPECIAL LAND ALLOCATIONS

We recommend that you clearly outline your policy toward special land-use allocations such as Areas of Critical Environmental Concern (ACEC's),
26-7 Rivers nominated under the National Rivers Inventory for Wild and Scenic River status (for both Phase I and Phase II), and National Natural Landmarks. This is not clear in the Draft EIS, and a policy needs to be developed which assures that these special areas are protected.

HERBICIDES

26-8 We oppose the use of herbicides on the forest. Herbicides should be compared to other methods of brush control with regard to cost, effectiveness, danger to human and animal health and damage to non-target species of plants.

We appreciate the opportunity to comment on this planning document.

Sincerely,

Debbie Deagen

Debbie Deagen for
The Corvallis Trail Committee
1135 NW 10th
Corvallis OR 97330

Response to comments in Letter 26.

26-1 See response to comment 3-1

26-2 The purpose of this EIS is to identify impacts on the natural and human environment associated with the proposed action and alternatives. The section on Impacts to Recreation discusses how the proposed action and each alternative vary in approach and emphasis on meeting recreational needs. The proposed Management Framework Plan (available in the Salem District Office) identifies specific management actions for recreation resources. Implementation of these management actions for recreation would be dependent upon the availability of sufficient funding.

26-3 The section on Impacts to Recreation analyzes these impacts.

26-4 Page 2-28 of the DEIS states that no areas within the SYUs are proposed wilderness study areas. Wilderness inventory units which were evaluated but failed to meet Wilderness Study Area criteria, including availability of opportunities for solitude or a primitive and unconfined type of recreation, include the Little Sink Research Natural Area, Nestucca River parcels, Willow Island, Well's Island and Marine Islands. In sum, no significant opportunities for this type of recreation were found to exist in the SYUs. Further information on specific recreational opportunities (e.g. hiking, backpacking, fishing, hunting, sightseeing) associated with unmodified natural environments can be found in the Unit Resource Analysis for the Westside of the Salem District.

26-5 See response to comment 4-15.

26-6 A definition of old growth has been added to the glossary. See text revision for page G-7.

26-7 See response to comments 13-3 and 15-4.

26-8 This comparison is shown between the proposed action and Alternative 8. The only difference between these two alternatives is that herbicides are used under the proposed action.

ASSOCIATION OF O & C COUNTIES

27

COMM. DALE D. SCHROCK, PRES.
BENTON COUNTY COURTHOUSE
CORVALLIS, OREGON 97330
PHONE 503-757-6800

COMM. BEN F. MAGILL, V. PRES.
POLK COUNTY COURTHOUSE
DALLAS, OREGON 97338
PHONE 503-623-8171

COMM. F. E. KNIGHT, TREAS.
TILLAMOOK COUNTY COURTHOUSE
TILLAMOOK, OREGON 97141
PHONE 503-842-5511

RAY E. DOERNER, EXEC. DIR.
486 HEYDON ROAD
ROSEBURG, OREGON 97470
PHONE 503-673-5298

DAVID S. BARROWS, COUNSEL
SUITE 200, CENTURY TOWER
1201 S. W. 12th AVENUE
PORTLAND, OREGON 97205
PHONE 503-227-5591

September 8, 1981

Mr. Joe Dose, Dist. Manager
c/o EIS Team (922)
Bureau of Land Management
P. O. Box 2965
Portland, Oregon 97221

Dear Joe:

On behalf of the Association of O&C Counties (the Association), the following comments on the Westside Salem Timber Management Draft Environmental Impact Statement (the DEIS) is herewith submitted. Dr. Robert Vincent, Wildlife Consultant, assisted in portions of this report.

As requested in the DEIS, these remarks will be limited to the adequacy, completeness, and accuracy of the Statement. Specific references, data, or literature citations will be used only to illustrate the broader, more general thoughts. Please accept these thoughts as positive and constructive even though they appear as negative.

I Legal Concerns

It appears that the range of alternatives displayed in the DEIS is of sufficient breadth to accommodate a legally acceptable Final Plan. However, as noted frequently later in this report, details are grossly lacking from which a decision can be made. The Association is cognizant that all alternatives shown need not necessarily meet existing statutory authority. We do, however, believe that the Proposed Action should meet existing law or otherwise explain just what remedial legislation will be required to bring the Proposed Action into compliance. Further, in any case, the adopted Final Plan must be within the legal realm.

The DEIS rightly recognizes that the principal authority and direction for management of the Salem Westside BLM lands come from the O&C Act and FLPMA. It further
27-1 notes that the directives of FLPMA are overridden by the O&C Act in the event of a conflict between the two Acts insomuch as the management of the timber resource is concerned. Even after recognizing that there are other special Acts that do take precedent over the above Acts, it still appears the Proposed Action cannot meet the legal test and should be reconsidered. Only Alternative 1 or possibly 2 (if further details are known) are legal, in our opinion.

II General

27-2 A. The glossary is inadequate. Important words are missing such as optimum; timber production base refers the reader to high-intensity, forest-management lands, but there is no such entry.

27-3 B. The use of terminology is not consistent, for example, habitat stratification (Table 2-4), habitat structure (Table 2-6), habitat types (Table 2-7), habitat age (Table 3-7), and wildlife habitat (App. E and F). All five terms are used to refer to the same age groupings of plants. Another example: the first sentence of both Chapter 1 and 2 emphasizes the existing environment as the comparison base, yet potential population of primary excavators (2-21) and optimum population of fishes (2-21) are used as a habitat base. In addition, maximum populations of primary excavators are used on p. 3-20 without equating maximum to potential.

C. The injection of unreferenced data is common such as snowfall data and little documentation of cavity dwellers.

D. The selection of references cited gives an impression of attempting to support a preconceived conclusion, not an accurate concensus that reflects available information. Examples are

Impact of roads on elk
Effectiveness of stream buffer strip
Impact of forest harvest upon birds
Elk requirement of old-growth habitat

27-4 E. The implementation of effective mitigation activities are not or only lightly considered.

F. The manner of presentation of much of the information in the DEIS is not conducive to easy interpretation or to retracing how a total or a conclusion was reached. Specific totals and numbers in the text and tables of acres, dollar values, board feet, animal numbers, etc., would facilitate meaningful comment.

III Land Base

The allocation of land to various uses is the most fundamental element in determining the final levels of output. Yet when studying the DEIS, we find that that determination has already been made and one can easily get the further impression that land allocation is not an appropriate issue at this late date. On Table A-2, under the catagory "No Planned Timber Harvest," there is a line item titled "MFP Withdrawals 2/." Footnote 2/ states "These are commercial forest lands withdrawn from the timber production base for other resource considerations. See the District's Management Framework Plan (MFP) for the identified resource and acres allocated." (emphasis added)

27-5 Under the Proposed Action, the MFP withdrawn lands are shown to be 29,732 acres, more than 12% of the study area. For what? The DEIS is totally deficient in explaining why this acreage was withdrawn, where they are located, and the rationale for their withdrawal.

27-6 On two occassions, August 18 and August 25, I personally visited the Salem District Office seeking further details relating to the MFP withdrawals. Each time I was promised an acreage breakdown by mail. To date, this Association has received nothing. Accordingly, it is impossible for us to discuss the merits of any of the Alternatives.

IV Socio-Economic Impacts

27-7 The section of the DEIS dealing with socio-economic impacts is flawed with improper comparisons. Allowable cut at the present is 156 MM bd. ft., but it is shown that only 122.6 MM bd. ft. were harvested annually during a recent two-year period. Then Table 3-16 shows an increase in employment should the Proposed Action be adopted because the new allowable cut will be 149 MM bd. ft. Does that table indicate that because a new allowable cut is determined, that amount of timber will be harvested each year? Likewise, Table 3-20, comparing the impacts of each alternative upon county tax bases, compares 1980 cash receipts from prior sales against projected annual contracted sales. In this case, current receipts cannot be compared with current or future sales. For example, in 1980 the counties received their share of cash receipts from a total $195 million, while contract sales for the same period exceeded $330 million. The logic (or lack of) makes both tables meaningless.

27-8 On p. 3-51 it is stated that the impacts of the alternatives were calculated at average 1980 sale prices. Nowhere is that value stated in the DEIS. By recalculating figures shown on other tables, this value appears to be far below the actual $329 per MM bd. ft. listed in the BLM Facts Report for 1980. This discrepancy should be clarified in the Final EIS.

V Forest Economics

27-9 The DEIS does not address the benefit-cost ratio of the various alternatives. Full funding of intensive-management practices and administration seems to be taken for granted in each of the alternatives. Since the present funding of the Western Oregon program is based upon an appropriation equal to 25% of projected receipts, it is important that this element be addressed in the Final EIS. How will each of the alternatives fare under the existing budgetary processes?

VI Visual Resource Management Areas

Some of the designated VRM II areas are as far as fifteen miles from a major highway. Reevaluation of many small scattered VRM II plots could return those that are not of true scenic value to the intensive timber base.

Because the BLM lands are in a scattered pattern, activities on the private intermingled lands will likely dictate the visual quality. The Association believes that only those areas or transportation routes designated as "scenic" by the State of Oregon or sub-division thereof should be considered for visual management.

VII Areas of Critical Environmental Concern

ACEC appears to be a catch-all withdrawal designation that functions as an umbrella rational for restricted land use. Some recreation lands are included; others, not. For one active bald eagle nest, 1,935 acres are designated. Table Mountain seems to be neither included nor excluded.

A table that would show acreages and proposed designations for all specialized-use withdrawals would be helpful. Among others, it could include ACEC, Recreation Lands, Special Areas, National Natural Landmarks, HCRS Rivers, Historic Sites, etc.

27-10 There is no discussion about the relationship of proposed special-designated areas and RNA cells. Do the proposed areas duplicate or supplement these specialized-area needs?

VIII Sensitive Plant Species

The plant list in Table 2-5 is confusing. These twenty-eight species have been designated as sensitive by either the Salem District Manager or the State Director, yet twenty-two of them have not been found on BLM lands in the SYUs. Such generalized designation reduces the meaning and acceptance of truly T & E species.

IX Riparian Zones and Buffer Strips

Riparian zones receive only brief mention under terrestrial vegetation and fishery habitat. Notwithstanding, the more than 15,000 acres (given only parenthetically) is a large acreage that apparently will have no harvest. None of the tables includes lands for this category. To arbitrarily remove this much acreage from all harvest needs strong justification. To this end, supportive data are lacking. Serious consideration should be given to a constrained harvest at a higher MHA.

Alternatives 1, 2, and 10 would have streamside buffer strips as provided by the Oregon Forest Practices Act. This Act requires maintaining soil integrity near the stream and leaving trees to provide 75% shade over the stream. In addition, the Forest Practices Act is reviewed annually by state and federal agencies with thus far generally favorable reviews. In at least three ODFW publications, the statement is made that commercial trees do not necessarily have to be left in buffer strips. Nevertheless, the DEIS states that in Alternatives 1, 2, and 10 temperatures will increase, stream productivity will deteriorate greatly, and salmonid populations will decline sharply. Therefore, it is logical to conclude that the Oregon Forest Practices Act is worthless in protecting fishery habitat. In fact, according to Table 3-10 the Act is a definite negative and causes much harm to stream habitat, for under Alternatives 1, 2, and 10 salmonid populations will decline 30-35% in the next twenty to one hundred years. Such a law that mandates the drastic decline of fishery habitat should certainly be repealed.

X Fishes

Approximately 350 miles of streams produce salmonids on BLM lands. Thus, the total fishery value is near $4,500 per mile of stream. This dollar value is not excessively high except that approximately 78% of the stream mileage is second- and third-order streams. Hence, some small streams must be extremely productive.

27-11 It is not explained how the current fish population is calculated to be 50% of optimum or what an optimum population is and why optimum was used for fishes but none of the other biota. Also, are the habitat conditions in Table 2-8 based on existing, potential, or optimum conditions?

The role of hatchery-reared salmon and trout in habitat and catch is not discussed.

XI Wildlife

A. Snags

27-12 In the discussion of snag-dependent species, no consideration is given to the 26% of the land base that has no planned timber harvest. Much of this land will have a high density of snags.

27-13 No justification is given for a 60% level of primary excavators. Why not 40% or 90%?

BLM must pursue an active snag-leave-policy. Cull trees or existing snags can be left now, but a panic reaction may develop if leave action is not initiated soon.

B. Spotted Owl

27-14 There are many inconsistent numbers of spotted owls, inconsistent acres of old-growth timber allotted per pair, and inconsistent following of Spotted Owl Task Force recommendations. For example, Alternative 3 will protect old-growth habitat for seven pair of spotted owls but no acreage is allotted for this purpose.

27-15 On p. 1-8, Alternative 3 would support seven pair whereas on p. 3-28, eleven pair. Also, acreage allocations per pair of owls by the Task Force are used

27-16 but number of owls is not used. Table 1-5 contains many unclear totals on the number of owls and acres of old-growth habitat. This table strongly indicates no relationship between old-growth habitat and spotted owls. The sections that discuss spotted owls and old-growth habitat are inaccurate, inconsistent, and confusing. They need to be completely reworked and rewritten.

C. Roosevelt Elk

27-17 Hunting benefits and impacts refer almost entirely to elk since deer populations are near optimum and upland game hunting is a relatively minor activity. Use of specific elk population numbers and harvest would make population changes more meaningful. The URA for the planning area gives a present elk population of 1086 and an average annual harvest of 35. With this small elk population on BLM lands and the highest Roosevelt elk populations in the state on adjacent private and state intensively managed forest lands, the marginal cost of each elk harvested from BLM lands becomes extremely high. No background is given

27-17 explaining how the elk population changes in Tables 1-5 and 3-9 were derived. It seems to need reiterating that a high percentage of the SYUs' land base has no planned harvest and that some of these acres are elk habitat.

27-18 A point is emphasized that 111,000 acres will have reduced elk use because of roads. The one-half mile impact distance is based upon Rocky Mountain elk, living where the animal, vegetation, and terrain are much different.

We appreciate the opportunity to comment on this DEIS. If the Association can discuss or explain any of our comments in more detail, please contact us. We do wish to work with you on a constructive level in the planning process. Likewise, we encourage you to be more open and straightforward in presenting data and supporting decisions.

Respectfully submitted,

Ray E. Doerner, Exec. Dir.

cc: O&C Executive Committee

Response to comments in Letter 27.

27-1 See response to comment 19-1.

27-2 The draft has been revised. The parenthetical insert should read (See Intensive Forest Management Lands). See text revision for page G-12.

27-3 All terminology about habitat does refer to the same thing. Potential and optimum (expressed as a percent) are used to describe the current situation. In this instance, maximum means the same as potential (i.e. habitat at 100 percent carrying capacity).

27-4 Mitigation measures have been built into the Forest Management Treatments and Design Elements section of Chapter 1.

27-5 The DEIS does contain reasons for the MFP withdrawn lands. See response to comment 16-6.

27-6 The request for an acreage breakdown of the MFP/withdrawal lands by alternative was made to the District during the week of August 10, 1981. The data was assembled and mailed on August 17, 1981. Apparently the first letter was lost enroute and a duplicate letter was mailed September 15, 1981.

27-7 Regarding the choice of a base harvest level, see response to comment 11-3. In Table 3-16, as well as in the rest of the EIS, future harvest levels are assumed to equal sales levels. Since the harvest of a timber sale may be postponed as long as 3 years after the sale, harvest levels may differ from sales levels from year to year. In the absence of substantial defaults or postponements of sales contracts, harvest volumes must approximate sales volumes over a period of years, thus recent harvest levels below sales levels are expected to result in harvests greater than sales in future years.

In Table 3-20, projected collections for the WSSYUs only are compared with FY 1980 total collections. It was considered appropriate to value projected harvests at FY 1980 average sales value to better reflect the increased value that future harvests will have relative to general price levels.

27-8 See response to comment 16-5.

27-9 Benefit-cost analysis of forest management treatments will be performed in preparation of the decision document. At that time consideration will be given to budgetary constraints on management alternatives.

27-10 Areas propossed for RNA designation do not duplicate cells that have already been filled.

27-11 See response to comment 14-4 for more detail on fish population size. Table 2-8 refers to the existing situation.

27-12 The land base receiving no timber harvest was taken into consideration while arriving at the figures in Paragraph 4 on page 3-22 of the DEIS.

27-13 The 60 percent level is a BLM Oregon State Office policy set forth in Instruction Memorandum OR No. 76-199. It was established to provide a safety factor above the 40 percent minimum viable population level suggested by Thomas (1979).

27-14 Table A-2 lists MFP withdrawals by alternative, owl habitat is contained in these. In Alternative 3, this amounts to 3,660 acres.

27-15 The section on northern spotted owls has been revised. (See text revisions for pages 2-23 and 3-36.) Where inconsistencies exist, the explanation is that while a certain number was a planning goal, the end result was sometimes different than those planning goals.

27-16 Table 1-5 has been modified to incorporate new information on spotted owls. However, some apparent discrepancies still exist, most notably in Alternatives 1, 2 and 3. All old-growth acreages during the first decade, except Alternative 10, contain 6,100 acres of younger age class with some scattered old growth (see page 2-20 of the DEIS). In general, this is not spotted owl habitat but is useful for some other old growth species. This reduces the first decade old-growth figure by 6,100 acres.

If the alternatives do not provide for owl habitat either by withdrawal or constraint (Alternatives 1 and 2), then even though old growth remains there are no guarantees that any of the old growth will be in large enough blocks to support owls.

27-17 Changes in elk numbers were derived using estimates of current elk numbers and habitat and optimum numbers and habitat, and projecting habitat changes by alternative. Detailed methodology is available at the Oregon State Office.

27-18 Until such time as data are available for Roosevelt elk, the studies cited provide the best information. BLM biologists recognize the differences between the animals and the habitat but can offer no better analysis.

28

Willamette Industries, Inc.
Building Materials Group
Sales and Operations Office
P.O. Box 907
Albany, Oregon 97321
503/926-7771

September 4, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P. O. Box 2965
Portland, Oregon 97221

28-1 The Salem B.L.M. Westside Plan assumes that the current forest management program has been adequate when in reality it has shown glaring weakness because of lack of strong leadership and the distribution of funds to other resource uses. One such example of weakness in the program is the lack of herbicides application, which has resulted in thousands of marginally stocked acres.

It is the height of hypocrisy to state that you can reduce the timber management acres, perform minor forest management, and then proclaim that you will produce the same volume as in the past. Your present program of hiring more resource people of various disciplines while reducing the forest management staff and budget can only lead to less timber being produced.

Timber receipts have made it possible to obtain resource people from other disciplines. Their action has decreased the importance of forest management and the subsequent impact is now visible in the field.

Your preferred alternative reduces timber harvest which results in the loss of jobs and income. In turn, this loss will effectively reduce the revenue to counties, which support many social programs.

Morris H. Bergman
Timberlands Manager

lm

Response to comments in Letter 28

28-1 During the mid-1970's, approximately 4,500 acres were treated annually in the Westside resource areas. This treatment level was considered adequate to meet silvicultural needs. Herbicide treatment was reduced while an EIS was prepared on BLM's program to manage vegetation with herbicides in western Oregon. Herbicide applications for 1979 and 1980 averaged 1,200 acres annually in the Westside SYUs, while in 1981 because of budget constraints no acres were treated with herbicides. Recent planting surveys indicate that stocking levels exceed BLM requirements in most cases.

29

September 8, 1981

Salem District Manager
% EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

I am concerned with your current Draft EIS and proposed alternative.

29-1

1. Your Western Oregon lands are some of the finest timber producing lands in the United States. The proposal is in violation of the O&C Act by not using every available acre to produce timber on these lands. The Act states in part to provide "a permanent flow of timber". The set asides, whether they are for Elk habitat or whatever other reason, cannot be justified and abide by the O&C Act.

2. Elk and other game are all part of the forest and can be managed nicely along with good timber management. The draft does not have enough evidence to require setting aside lands for a single special cause.

3. Another facet of the O&C Act which is in conflict with your proposed alternative is " . . . contributing to the stabilization of local communities and industries." Your proposed alternative reduces current harvest by 10 million board feet. This is on lands that should be supporting 200 million board feet cut with good management. This could result in a loss of 168 jobs and deterioration of community stability. The income loss to the Bureau of Land Management from the loss in timber sales will also be reflected in the receipts to all O&C counties.

The O&C Act is a good one --- proven well in time. The plan should allow your Forest Managers to manage every acre for what it will best produce.

Robert D. Berends

967 West Ellendale
Dallas, Oregon 97338

Response to comments in Letter 29.

29-1 See response to comment 19-1.

R.L. McNitt
40823 Huntley Rd.
Stayton, Oregon 97383

September 8, 1981

30

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Mr. Dose

I would like to comment on the Salem District Westside Draft Timber Management Environmental Impact Statement.

The EIS as presented is grossly inadequate. It is my understanding that an EIS analizes the complete range of impacts resulting from a given mix of land management actions. The Bureau of Land Management's forest land management policies are defined in the 1937 O & C Act. This act clearly identifies timber production as the dominant forest land use.

The Westside EIS fails to promote timber production from an advocate position (the other uses seem to do quite well) much less as the dominate use which is required by the 1937 O & C Act. A complete EIS explores comprehensively both the positive and the negative impacts of maximum (all acres and full intensive management) timber production as it relates to other forest land uses. The analysis must explore the mitigating measures available to minimize potential detrimental impacts and maximize positive impacts of all uses.

The EIS should focus on creative methods of minimizing the conflicts between maximum timber production and other competing uses. The tone should be positive emphasizing that intensive use of the forest land is not only possible but in concert with the mandates of the law and in the best interests of the public.

Respectfully

R.L. McNitt

RLMc/tic

9449 SW 62nd Drive
Portland, Ore. 97219
September 7, 1981

Salem District Manager
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

RE: Westside Salem District
Draft Timber Management EIS

Attention: EIS Team (922)

It is disappointing to discover that the BLM approach to land planning in the Westside Salem District places timber management as THE central concern, with all other resources and uses secondary and subservient to timber management. Obviously, that approach is not what multiple-use is all about. The heavily-weighted emphasis on the use of any one resource puts all other concerns at a big disadvantage, and that is just what the Draft Westside EIS does. A "timber plan" with no comparable plans for other multiple-use factors is an inadequate EIS. 31-1

The alternatives offered in the Draft EIS have left out the "no harvest" alternative, important and necessary in order for the full range of possible alternatives to be considered, even though it is an unlikely final choice. It must be included in the final EIS, as it is obviously the most favorable to wildlife and other non-timber values, contrary to the alternative described in the Draft EIS as most favorable to those values. How can a reasonable choice of alternatives be made when the list of alternatives offered is incomplete? 31-2

Lacking the "no harvest" alternative as a choice, I must support Alternative 5, which comes closest to providing adequate ongoing wildlife habitat, watershed protection, and resources other than timber production.

I am concerned about the apparent narrow interpretation of why one pair of northern spotted owls needs the 1000 acres of undisturbed habitat, and that there would be provision for only one pair. The pair of owls are not an isolated species which needs that 1000 acres for itself. Those owls are an indicator species--they represent a large list of plants, animals and birds that must be protected for their continuation, and which must have adequate undisturbed habitat. To suggest that the Westside Salem District would have only enough habitat for one pair of owls shows that the District has chosen to severely limit the numbers of all those other forms of life which require that particular habitat. 31-3

The program to maintain existing stands of old growth must be accompanied with a clear definition of "old growth" so that it would be possible to determine whether the truly old-growth dependent forms of life will be protected, or whether old-growth merely means timber somewhat older than presently viewed as a marketable age. With the pressures increasing nationwide to convert all old growth timber into new tree plantations, an unassailable definition is needed, with a strong policy taken by the BLM to retain certain amounts of those old growth forests. 31-4

Certain other special land categories in which the BLM does not intend to "manage" timber should also have clear statements of policy--rivers under the National Rivers inventory for Wild and Scenic River classification, areas nominated as National Natural Landmarks, and any other Areas of Critical Environmental Concern. Those statements should be included in the Final EIS. 31-5

And as always, I oppose the use of herbicides on BLM land.

Sincerely,

Vera L. Dafoe

Vera L. Dafoe

Response to comments in Letter 31.

31-1 This EIS on timber management is prepared in accordance with the settlement agreement of February 19, 1976, relative to the litigation in the U.S. District Court for the District of Columbia, entitled Natural Resource Defense Council, Inc., et al. v. Thomas S. Kleppe, et al., Civil No. 75-1861. The proposed management framework plan establishes guidance for the other resource management activities. Plans for those activities will be subject to environmental analysis as they are developed in more detail.

31-2 See response to comment 3-1.

31-3 It is recognized that the spotted owl is only one of a number of species that use that type of habitat. Appendix D lists others with similar habitat requirements. As Table 3-8 indicates, there are many more acres of old growth available in the proposed action than the 1,000 necessary for one pair of owls. The problem is the distribution of this old growth as there is only one area with enough to provide 1,000 acres within 1.5 miles.

31-4 A definition of old growth has been added to the glossary. See text revision for page G-7.

31-5 See response to comments 13-3 and 15-4.

United States Department of the Interior

NATIONAL PARK SERVICE

Pacific Northwest Region
Westin Building, Room 1920
2001 Sixth Avenue
Seattle, Washington 98121

IN REPLY REFER TO:

1202-D3
DES B1/29

SEP 8 1981

Memorandum

To: Salem District Manager, Bureau of Land Management, Portland, Oregon

From: Acting Associate Regional Director, External Services, Pacific Northwest Region

Subject: Review of the Westside Salem Timber Management Draft Environmental Impact Statement

We have reviewed the Westside Salem Timber Management DES and have the following comments concerning the recreational and cultural aspects of this proposal.

Recreation

Several impacts on recreation will occur; some beneficial and some adverse depending upon visitor recreational preferences. A balance of recreational opportunities should be sought to provide the visitor with several options. If certain recreational activities are lost due to timber management operations, compensation should be considered. An increase in opportunities for recreational activities which are compatible with timber management operations does not lessen the loss of other recreational activities. For instance the construction of logging roads could create more opportunities for ORVs but degrade the wildland experience of some hikers.

Cultural Resources

Field surveys of the Westside Salem sustained yield units (WSSYUs) have not been done; however complete field surveys of cultural resources are planned prior to each specific timber management action that would result in ground disturbance (p. 3-34). On p. 3-34 it is stated that some sites possibly would remain undiscovered.

On p. 3-36 the statement is made that under the proposed action and all alternatives, protection would be provided in accordance with the National Historic Preservation Act of 1966 and 36 CFR 800. Under the "proposed action and all alternatives" except 1 and 2, the 37 known historic sites

32-1 on public land would be fully protected. Sites determined eligible for the National Register would be protected under alternatives 1 and 2, while appropriate measures for data recovery would be developed for all other cultural sites prior to ground disturbance (p. 3-36). The appropriate measures referred to in the preceding paragraph are not described in the DES.

We are concerned about the following statements:

> "It is possible that undiscovered cultural resources could be inadvertently impacted under the proposed action and all alternatives." (p. 3-36)
>
> "Undiscovered cultural sites would be susceptible to considerable alteration due to artifact breakage or destruction." (p. 3-37)
>
> "Under alternatives 1 and 2, only sites determined eligible for the National Register would be protected in place and appropriate measures for data recovery would be developed for all other cultural sites resulting in an irretrievable loss of some information." (p. 3-37)

Burying archeological evidence without disturbing its integrity is considered preservation "in site" and is acceptable; however, destroying artifacts without taking measures to identify, evaluate and record is unacceptable. A comprehensive mitigation plan should include appropriate steps to predict where objects of cultural significance may be found and recording or preserving intact uncovered artifacts.

32-2 If cultural materials are discovered during excavation, work should cease and the Oregon State Historic Preservation Office (SHPO) should be notified.

32-3 The Oregon SHPO should also be consulted early in developing an adequate assessment program, and to determine if any properties are eligible or included in the National or State Registers of Historic Places.

The SHPO for Oregon State is:

David G. Talbot, Administrator
Oregon State Parks
525 Trade Street S.E.
Salem, OR 97310

Supporting documentation (a written letter) of the SHPO's recommendations should also be included.

Richard L. Winters

Richard L. Winters

Response to comments in Letter 32.

32-1 Should the final decision adopted coincide with Alternative 1 or 2, the site specific environmental assessments which precede each timber sale would identify site specific impacts and prescribe the appropriate measures for data recovery.

32-2 Pages 1-11, 1-12, 3-34 and 3-36 of the DEIS state that appropriate measures are taken to identify and protect cultural resources prior to ground-disturbing activities under the proposed action and all alternatives. Further, pages 1-11 and 1-12 state that when a cultural resource is discovered during timber harvest or associated activities, operations in proximity are immediately suspended pending analysis and consultstion with the SHPO, if appropriate.

32-3 Page 2-26 of the DEIS states that a number of procedures, including those specified in 36 CFR 800.4(a) calling for consultation with the SHPO, were used to identify cultural resources in the SYUs.

(1)

33

Sept. 9, 1981

Salem District Manager
c/o EIS Team 922
BLM
P.O. Box 2965
Portland, OR. 97221

In reviewing the Draft EIS for the Salem District's Westside SYUs I have a few major complaints and several more specific comments to bring to your attention.

33-1 First of all, I noticed that nearly the entire document is written in the conditional, that is using WOULD instead of WILL. I can see where that sentence structure is applicable in discussions about the Alternatives, but impacts of the Proposed Action should be stated more confidently if they are indeed known.

Perhaps the actions and impacts <u>are</u> conditional, based on the availability of personnel and funding. That brings me to another major complaint: 33-2 the whole analysis is based on the erroneous assumption that "sufficient funding and personnel will be available for implementation of the final decision" (pg. 3-2). I see no basis for making that assumption in the light of recent and expected trends in federal personnel and funding availability.

(2)

I perceive a contradiction in the fact that, on one hand, it is claimed that there is "No Surplus Inventory" and on the other hand, it is stated that all Threatened/Endangered species and cultural resource values discovered in the future will be protected according to the laws and policies pertaining to them. 33-3 How can the program "remain flexible for increases in future harvest" (pg. 1-27) yet have "no surplus inventory"...to make...available for accelerated harvest" (pg 1-4), especially when wildlife, plants and cultural resources can be expected to account for withdrawal of certain sites from timber production?

BLM's scattered ownership accounts for less than 10% of the land in the SYUs (Table 1-1), therefore I believe that some of the impacts – both positive and negative – are going to be meaningless when viewed as a "minor contribution" to the impacts taking place over the entire EIS area. BLM's affect on watershed values (pg. 3-9), wildlife survival, and air quality are probably only local in extent: though I support protection of non-timber values, I believe the positive aspects of BLM's programs are often exaggerated in this analysis.

(3)

Throughout the Draft EIS, references are made to various studies, usually not on BLM land or concerning BLM management techniques. The analysis would be improved by mention of conditions, trends and practices on the lands which are being analyzed. Examples of this lack of directly relevant data occur on pg. 3-11 (Nitrogen reaching streams...), pg. 3-13 and 3-23 (Broadcast burning) and pg. 3-15 (Herbicide application). Were district resource
33-4 specialists contacted for opinions on the suitability of the cited studies to conditions on district lands?

It appears that alternatives 1, 2 and 10
33-5 do not comply with federal laws and policies. Why are they even given consideration beyond saying that they could not be adopted?

Finally, what is the point of projecting
33-6 estimates 40 decades into the future – no one 400 years ago could have come anywhere near to guessing the conditions we live under today. It seems futile to me to make any assumptions at all about trees which are not even planted yet: Who knows, in this rapidly changing world, what species will even be planted?

(4)

COMMENTS ON SPECIFIC TOPICS

Air Quality

pg xv: The amount of slash that gets burned is not a direct result of the amount generated. It is dependent on personnel and funding (I doubt assumption on pg. 3-2 will hold) and on weather (which is unpredictable) and inter-agency agreements.

pg 2-3: Table 2-1 is useless without commenting
33-7 on whether or not BLM burns contributed to "smoke intrusions" and "days exceeding particulate standards": in other words, are BLM burns conducted during favorable or unfavorable conditions?

pg. 3-3: Particulates seem to be the main concern, (not chemicals)
33-8 pg 1-19 but "tons per year" is meaningless unless compared to standards, past values, or complaints from the public.

pg 3-2: Do burns in the Portland area average
33-9 >50 acres and those in the Salem area >80 acres? I thought BLM units were usually <40 acres.

pg 1-25, item 13: Judging by the large demand for firewood and the small number of cutting areas designated by BLM, I would not agree that "Use of cull logs and slash for ...firewood is encouraged".

(5)

Timber and Reforestation

33-10 pg. 1-5: Why is it that under all alternatives more acres will be clearcut than will be planted?

pg. 1-10, Alt. 9: I agree with this approach...
33-11 Don't count your chickens before they're hatched! Alt. 10: Why can't the planned levels of CT and PCT be achieved?

33-12 pg. 1-13 Isn't the term "over-mature" outdated and biased? Who determines "over-maturity" – a mathematician, an economist or a biologist?

pg. 1-14 What percent of the time is the FEIS Vegetation Management with Herbicides...
33-13 actually adhered to? Are water samples taken in glass containers (rather than plastic) to ensure valid readings? (pg 1-17)

Can trees really be genetically "improved"
33-14 or just genetically altered? There should be a discussion of the dangers of sacrificing variability and adaptation for short term acceleration of growth.

33-15 pg. 1-16 Who writes Environmental Assessments – someone in favor of the proposed project, someone requesting changes, or a person separate from the decision-making process?

pg. 3-46: Figure 3-2 would be more clear if displayed in bar graph form.

(6)

Vegetation

pg. 2-15: Mentioning the "Northwest Coastal Coniferous Sub-biome" seems unnecessary... the glossary definition of Biome does nothing to clarify the matter either. Understory vegetation in the Coast Range is usually dense, in my experience, certainly not "poorly developed". Paragraph 5: Aspect and
33-16 soil type are not "climatic conditions". Standard notation should be used in the list of plant communities – slashes and hyphens, not commas, are used to define plant community associations and structure.

pg. 3-13, para. 4: What evidence is there that "early
33-17 successional stages are more quickly passed through"? It may be that the only difference is the presence of conifers in early as well as later successional stages. The treatment of the issue of planting "genetically improved" trees is very short-sighted, and shows lack of research (try incorporating the information in "The Care and Handling of the Forest Gene Pool" by Roy Silen. Pacific Search Vol. 10, No. 8. June 1976).

pg. 3-14: Table 3-7 is confusing. Appendices E and F are much more useful for evaluating age class composition changes over time.

33-18 pg. 3-15: Do the figures cited in the 1974 study pertain to BLM herbicide applications planned for the 1980's?

pg. 3-16: Succession after harvest does not produce the same plant communities as occur on undisturbed sites — the practices of planting and silvicultural treatments create unnatural plant communities (Para. 1).

33-19 Para. 2: Who determines when age classes are "balanced"? Is "balance" considered to be the pre-European composition, pre-URA, or that which maximizes timber harvest opportunities?

Overall, the Vegetation chapter seems biased toward timber. Secondary effects on timber are highlighted at the expense of more detailed information on the direct impacts that timber management activities have on the vegetation as a whole.

Wildlife and Fish

The chapter on wildlife seems repetitive and poorly organized. It's thoroughness, in fact, would be more effective if the paragraphs were re-arranged to provide a more easy-to-follow explanation. It is helpful to be told which animals benefit and which suffer by various actions, since different people place differing values on any particular species.

33-20 pg. 3-26: Are there no quantitative data available on decreases in fish? Also, what does "adverse impact" refer to — numbers of fish, species diversity, or catch success?

33-21 pg 3-27: What is BLM's record regarding herbicides entering streams — that's more pertinent than referring to others' studies.

33-22 pg. 1-9: Do the Westside SYUs contain many of these 1920-acre parcels or is interagency management to be utilized?

Soils and Water

33-23 pg. 3-6: What occurrence of road failures and increased erosion is associated with BLM activities in the SYUs? Data on road failures per mile constructed or landslides per acre clearcut would be enlightening.

33-24 pg. 3-7: The values in Table 3-4 are much higher than the 0.42 tons/acre/year stated in Paragraph 2 even when converted from tons/acre/decade to tons/acre/year.

33-25 pgs. 3-9, 3-11: Mention is made of Nitrogen entering streams, but no mention of why that is of concern is apparent. Does the loss hinder regeneration or is it detrimental to aquatic life to have 3 days to 6 months with excess Nitrogen in the water?

Sensitive, Threatened and Endangered Species

33-26 ↓ pg 2-17: Aren't proposed T/E species afforded the same protection as officially listed ones — why not say so? Examples of mitigating measures should be revealed rather than just saying "appropriate measures", which is too open to opinion (3-15).

33-26 What is BLM policy regarding Sensitive species — how often is it adhered to?

pg. 1-11, paragraph 4: The efforts made when T/E species are expected to be affected by projects are often to avoid responsibility rather than to "modify, relocate, or abandon the project". BLM "requires a survey of the project site ..."

33-27 : What percent of such surveys can be realistically assumed to be accomplished, considering current budget trends? (This observation applies not only to plants and wildlife, but cultural resources as well).

33-28 Finally, why have Oregon Sensitive PLANT Species been largely omitted from consideration?

Socio-economic Conditions

It appears that BLM activities do not have substantial effect on revenue or employment in the counties of the SYUs when viewed as a percentage of the total. Economic considerations should therefore be secondary to environmental

protection, and treated as localized impacts. Environmental degradation (Alternatives 1, 2 & 10?) should not be "justified" merely to provide jobs. BLM's primary responsibility is sound land management, not creating jobs by risking the natural resources which future generations will depend on.

Thank you for the opportunity to review and comment on the Statement,

Patricia Rogers-R.

Patricia Rogers-R.

4155 Macleay Rd SE
Salem, OR 97301

Response to comments in Letter 33.

33-1 "Would" is used for all alternatives, including the proposed action (preferred alternative), to indicate theoretical or hypothetical condition (if the proposed action were selected, then an impact would occur).

33-2 See response to comments 4-1 and 4-17.

33-3 To remain flexible for future increases in timber harvests is an objective of the Forestry Program for Oregon. The degree to which each alternative would be consistent with that objective is stated in the discussion. See revised Table 1-7.

33-4 District resource specialists were totally involved in the EIS process.

33-5 All alternatives analyzed in the EIS will be considered for adoption under the final decision. See response to comment 16-1.

33-6 The 400 year projection period is used only to ensure that the allowable cut is sustainable. More detailed information may be found in Appendix A, Allowable Cut Computation.

33-7 Burning occurs only at times approved by the Oregon State Department of Forestry which administers the Smoke Management portion of the State's Air Quality Implementation Plan. Even with approved burning during the past 5 years there have been one major and 20 minor intrusions from WSS slash burning into designated areas. Burning is not allowed during periods of high air pollution or air stagnation.

33-8 Tons per year is the unit of measure selected so that a comparison can be made between the past decade (i.e., existing situation) and the proposed levels under each alternative displayed in Table 1-5.

33-9 Planned burns may cover all units in a sale, rather than a single unit.

33-10 The acres to be planted (Table 1-2) were derived using the following: All clearcut acres plus all stand conversion acres, less those acres turned into roads.

33-11 The proposed commercial thinning and precommercial thinning for the second decade under the 1972 plan were based on inventory plot expansions resulting in extremely high sampling errors. An operations inventory (see Appendix A) completed in 1978 has provided a better estimate of projected treatment needs. Thinning levels proportional to the allowable cut would be accomplished during the proposal period if this alternative is adopted.

33-12 On page 1-13 of the DEIS, the use of the term over-mature timber indicates those areas vulnerable to death, windthrow and breakage. Also see Glossary, Sanitation/Salvage Cutting.

33-13 Application and monitoring procedures as described in the FEIS on herbicides are consistently followed by BLM field personnel. The BLM State Office routinely evaluates district offices to ensure compliance.

Water samples are collected in plastic containers. Samples of phenoxy herbicides (2,4-D) are preserved by the addition of sodium hydroxide, which prevents the compound from adsorbing to the plastic container's interior walls. Other pesticides which do not readily ionize are prevented from microbial degradation by freezing of the sample. BLM sampling procedures are done as prescribed by the Oregon Department of Agriculture.

33-14 Anticipated impacts from the use of genetically improved stock were discussed in Chapter 3, Terrestrial Vegetation, page 3-13.

33-15 Environmental assessments are prepared by district personnel, generally by someone associated with the proposal, with interdisciplinary involvement.

33-16 Aspect or the relationship of the ground surface to the direct rays of the sun and soil type, which takes into consideration moisture-holding capacity, heat absorption and/or reflection abilities, do directly affect site specific climatic conditions. North-facing slopes are cooler and have higher humidity than do south-facing slopes. Variances in plant communities are directly related to these conditions.

33-17 That "early successional stages are more quickly passed through" has been observed repeatedly in the field.

33-18 Yes, they do.

33-19 The "balance of age classes" referenced in the text refers to the even distribution of acres by age class of a regulated forest. See Glossary, Regulated Forest.

33-20 There are no quantitative data available. The estimates are based on habitat changes.

33-21 BLM routinely monitors its spray programs. In all western Oregon Districts, only once have measurable amounts of herbicides been found in adjacent streams.

33-22 All 10 of the proposed 1,920 acre blocks are under BLM management. In some cases not all of the 1,920 acres are contiguous.

33-23 Data on new road construction are not available; however, the inventory of all BLM roads shows there are 3.06 failures per mile in Westside Salem. A small sampling of steep slopes that were clearcut shows that there were 64 headwalls, 25 of which had roads, and of that 25, 18 failed. On the 39 headwalls without roads, there were 5 failures.

33-24 Changes in sedimentation were calculated only for the acres altered by clearcutting and road building. Also see text revisions for pages 1-19 and 3-7.

33-25 Current interest about nitrogen content of streams appears to center around the questions of forest management practices causing toxic levels of nitrogen in streams and increasing undesirable aquatic plants. R. L. Fredriksen in Impact of Forest Management on Stream Water Quality in Western Oregon (1972) reported the concentrations of ammonia nitrogen and nitrate nitrogen in runoff from a slash burn. The maximum concentration of 7.6 ppm ammonia nitrogen came the day of the burn, and the 12 day average was 1.19 ppm. Nitrate nitrogen peaked 1 year after the burn at 0.43 ppm. Fertilization with urea caused a peak of 0.17 ppm nitrate nitrogen. These are the highs reported from several studies, and they are well below the 10 ppm toxic levels. Nitrogen and other nutrients are rapidly utilized by riparian vegetation and the resultant increase in growth shades the streams.

The predicted amounts are far below levels toxic to adult fish. However, recent laboratory research (Kincheloe, John W., G.A. Wedemeyer and D.L. Koch 1979. Tolerance of Developing Salmonid Eggs and Fry to Nitrate Exposure. Bull. Environmental Contamination Toxical 23, 575-578) indicates that nitrate levels of 5-10 mg/l can be mildly toxic to eggs and fry of steelhead and rainbow trout. The extent of this problem in the field, if it exists, has not been reported.

33-26 The sensitive species listed in Table 2-5 would receive the protection provided under the Endangered Species Act of 1973 until their status has been determined.

33-27 All sites which would undergo ground manipulation activities would be surveyed. See page 1-11 of the DEIS.

33-28 The State of Oregon has not published an official sensitive plant species list as of this writing.

34

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Division of Ecological Services
Portland Field Office
727 N.E. 24th Avenue
Portland, Oregon 97232

Reference: ES

September 10, 1981

MEMORANDUM

To: State Director, Bureau of Land Management

From: Field Supervisor, Division of Ecological Services, Portland Field Office

Subject: Review of Draft Environmental Impact Statement for Westside Salem Proposed Timber Management Plan

We have reviewed the subject statement and provide the following comments for use in preparing the final statement.

In general, this statement adequately describes the proposed action, possible alternatives, the affected environment, and environmental consequences of all alternatives. Alternative 5, which strongly emphasizes wildlife values, would provide the greatest benefit to resources of concern to the Fish and Wildlife Service. However, the proposed alternative would also improve existing conditions for fish and wildlife resources.

Specific Comments

34-1 Page 1-12, Transportation System. Metal culverts are the only method described for stream crossings. Alternative structures such as bridges would be preferred since they would have less effect on streamflow velocities and fish passage. Discussion of bridge alternatives should be provided in the final statement.

34-2 Page 1-21, Monitoring and Studies. Methodology and scheduling for monitoring of stream habitat quality should be described in this section.

34-3 Page 2-9, Soils. Surface erosion from sites where logging or road building has recently taken place should be quantified in this section. Erosion from such sites would be the major source of sediments to streams in the planning unit.

CONSERVE AMERICA'S ENERGY

Save Energy and You Serve America!

34-4 Page 2-9, Water Resources. Low summer streamflows occur in many streams of the area due to limited ground water storage and snowpack. Accelerated sedimentation is not limited to the Tillamook Bay Watershed, but also occurs in other streams such as the Nehalem and Siletz Rivers. The final statement should acknowledge the broader distribution of this problem.

34-5 Page 2-16, Wetland and Aquatic Vegetation. Location, type, and area of various wetlands within the Westside Salem units should be included in this section. Information concerning wetlands within these units has been compiled by the Fish and Wildlife Service and has been provided to the Bureau of Land Management Oregon State Office.

Page 3-12, Terrestrial Vegetation. It is stated that impacts to riparian vegetation would be insignificant for the proposed action and Alternatives 3 through 9. Methods by which riparian vegetation would be protected, as well as a detailed description of this zone, should be included in this discussion. This section also states that alteration of the riparian zone would be inconsistent with Executive Order 11990 for protection of wetlands. Other wetland types present within the planning units should be described, and the consistency of all program alternatives with their protection under Executive Order 11990 should also be discussed in this section.

34-6 Page 3-17, Transportation System. Revegetation of obsolete or unneeded roads could be accomplished to help mitigate losses of wildlife habitat caused by new road construction.

34-7 Page 3-25, Transportation System. Sedimentation from roadbuilding would be lessened under most alternatives because roadbuilding would be reduced. Total sedimentation produced by all existing roads within the planning units should be quantified to better describe impacts upon aquatic habitat.

Russell O. Peterson
Field Supervisor

cc:
EC, DC
ES (P&L) DC

Reaponae to comments in Letter 34.

34-1 Alternative stream crossing atructurea are considered on a site by aite basis. The environmental consequences and merita would be addressed in an environmental assessment.

34-2 Stream habitat is a component of wildlife habitat as listed in paragraph six, page 1-21. Monitoring programa for other resources will be outlined in the decision document.

34-3 Surface erosion from recently logged aitea or newly built roada does increase, but whether the eroded soil particles actually travel as far as the streams is not known, only assumed. When road area increasea beyond 12 percent of a watershed, and is combined with soil compaction and logging, runoff increasea; however, the stream sedimentation may be the result of bank sloughing from the increased flow. The estimated erosion for the past decade is given in Table 3-3 for comparison to the proposed action and alternatives.

34-4 See text revision for page 2-9.

34-5 Wetland areas are protected by Executive Orders 11988 and 11990 (Floodplains; Wetlands); and the Sikes Act, Title II, P.L. 93-452, as amended. All alternatives except 1 are expected to be consistent with the above. See revised text for page 3-12, Impacts on Vegetation.

34-6 This could be done and the District Office would consider any such request by an agency contingent on a site specific review.

34-7 With about 36 percent of all existing BLM roads (9,758 acres of roads) in the SYUs surveyed, BLM has found 3,441 sediment-producing incidents affecting a total of 2.8 acres; however, the amount of sediments these incidents produced is not known.

35

LANE COUNTY AUDUBON SOCIETY
AN OREGON CHAPTER OF NATIONAL AUDUBON SOCIETY
P.O. BOX 5086 • EUGENE, OREGON 97405

September 5, 1981

Mr. Joe Dose
Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

Draft Timber Management EIS
Salem District, Westside

Dear Mr. Dose,

35-1 Lane County Audubon Society supports Alternative 5. Although this Alternative emphasizes wildlife and other non-timber values, it does not represent an extreme position. The extreme position, or "No Harvest Alternative" was not included in the array; although, for comparison's sake, there should have been such an Alternative. The Alternative 5 which is intended to be most favorable to wildlife still includes a harvest of 99 million board feet.

35-2 We are supportive of your plan to maintain existing stands of old growth timber and to manage for older forest in the future. The plan, however, is not entirely clear about the age distributions. We consider old growth to be 250 yrs plus with a canopy of 75%, and we are concerned that age classes be distributed evenly so that old trees are coming on line continuously. We are also concerned about how snags are going to be furnished in younger rotation areas. We think this is particularly important in preserving stream gradients and cavity dweller habitat. Without a clear indication of the age classes and distribution patterns, it will be difficult to evaluate the success of the program in protecting older forest ecosystems.

We oppose the use of herbicides and spurious allowable cut effect.

35-3 More detail in the Plan is needed to address the Corvallis-to-the Sea Trail, proposed Wild and Scenic Rivers, National Natural Landmarks, and Areas of Critical Environmental Concern. Clear policies to protect from timber harvest activities are needed.

Thank you for the opportunity to comment.

Very truly yours,

Thomas Mickel,
President

Sydney Herbert
Conservation Chair.

Response to comments in Letter 35.

35-1 See response to comment 3-1.

35-2 See text revision for page G-7 for a definition of old growth. Table 3-8 and Appendices E and F provide information on distribution.

35-3 See response to comments 4-15, 13-3 and 15-4.

Defenders OF WILDLIFE

September 8, 1981

To: Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

From: Sara Polenick 772-4606
NW Field Rep, Defenders of Wildlife
P.O. Box 4491 378-7352
Medford, Oregon 97501

Re: Westside Salem Draft Timber Management EIS

I appreciate the opportunity to comment on the Draft Westside Salem Timber Management EIS. My remarks are submitted on behalf of Defenders of Wildlife, a national, nonprofit conservation organization with more than 50,000 members. A few page-specific comments will be followed by some general questions and suggestions.

Page-Specific Comments

P. 1-9, Alternative 5

-1 The discussion about maintaining blocks of old growth habitat is somewhat obscure, particularly the use of the numbers. What is meant by 1,920 acres containing 640 acre blocks, and 240 acre areas containing 80 acre blocks?

-2 In the second paragraph, it would be helpful if the discussion on distribution of old growth blocks were expanded. It is unclear whether this alternative is designed to offer greater or lesser wildlife benefits than alternative four, which utilizes the corridor management plan to prevent genetic isolation. The optimize wildlife alternative certainly should address this crucial issue.

P. 2-21, Para 1

-3 The discussion on snags leads me to suspect that in the Salem District, BLM has been in violation of the agency's policy on snag retention, and that the situation is not likely to change when the timber management plan is implemented. Is this an accurate assumption? If not, the FEIS should explain how the past deficiencies will be remedied.

P 2-23, Para 4

-4 In reference to the statement, "There are 26 known locations of owls on BLM administered lands," some questions arise: Does "locations" mean nests? Are there 26 individuals or pairs? Does "BLM administered lands" refer to BLM land only in the Salem district?

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P. 3-23, Last para

36-5 Recent studies have demonstrated that mountain beaver damage can be reduced with integrated control methods which reduce the necessity to trap or otherwise eliminate the animals. Preliminary site evaluations should include an assessment of the potential for mountain beaver damage to new seedlings. Clearcutting may invite heavier losses. Other possible integrated controls include vexar tubing, the encouragement of predatory birds and mammals, and the planting of alternative forage when the seedlings are small. The FEIS should address the use of these alternatives.

P. 3-24, Herbicides

It is unfortunate that the "state of the art" with respect to the effect of herbicides on wildlife has not advanced appreciably since the BLM released the herbicide EIS in 1978. It does not seem unreasonable to suggest that some monitoring should be conducted to help determine what the long-term effects of herbicide use are on wildlife.

36-6 The discussion of diesel oil as an herbicide carrier should be expanded to include some reference to the effect of oil on birds' eggs. Ingestion is not the only potential problem.

P. 3-28, Para 1 - 3

36-7 It does not appear as if the revised recommendations made by the Oregon Endangered Species Task Force have been incorporated into the discussions of the proposed action, the alternatives, or the environmental consequences. If only one owl pair will remain under the proposed action and most alternatives, then the conclusion on the same page (which predicts that long-term changes to wildlife habitat will be beneficial) is misleading. The final document should present, as clearly as possible, the probable impact of timber management activities on the spotted owls, and include a proposal (possibly a revision of Alternative Five) to protect the 26 pairs which are now living in the SYUs. If spotted owls require old growth foreste, and the proposed action if implemented will preserve the old growth, then why will only one pair remain according to the revised Task Force recommendations?

This exercise in speculation should encourage a conservative decision with respect to the destruction of existing spotted owl habitat. When more information is obtained, better decisions can be made.

General Comments

On the positive side, the Westside Salem DEIS has several strong points. We appreciate the inclusion of the ecosystem alternative (5), and were pleased to see that it reflected the recognition that wildlife benefits the most when the essential components of the natural habitat are left in tact. We also appreciate the intention to protect riparian zones, retain old-growth forest lands, and manage for unique and special wildlife habitats in the proposed action.

The major deficiencies in the DEIS relate to some serious questions which are not answered in the document:

6-8 1) What is the difference between alternatives 4 and 5 with respect to the distribution of old growth areas, and why were the two alternatives separate?

6-9 2) Under the proposed action, how will the old growth areas be distributed?

-10 3) Will the riparian zones which are to be protected under the proposed action provide corridors connecting the old growth areas?

-11 4) What percentage of the BLM land in the Westside Salem District will be managed as mature forest?

-12 5) What effect will the implementation of the proposed action have on pileated woodpeckers, which require relatively large diameter snags for nesting?

-13 6) At least one alternative (and preferably the proposed action) should be designed to maintain viable populations of native wildlife. Which of the alternatives in the draft meets this test? It is difficult to ascertain, as the question of population viability was not addressed adequately in the draft, but should be the crux of the wildlife management strategy. The size, structure, and arrangement of the old growth/mature forest areas must be carefully planned to assure that populations of all wildlife species are sufficiently large to be self-sustaining and avoid genetic deterioration through inbreeding.

-14 7) Is monitoring contemplated to assure that wildlife objectives are to be met?

-15 8) What will be the policy regarding dead and down logs, which are important to wildlife for cover, food storage, nesting, etc.?

-16 9) How can the snag retention policy be more effectively implemented?

36-17 10) Will the proposed retention of existing old growth be sufficient to maintain self- sustaining populations of goshawks, pileated woodpeckers, brown creepers, and red crossbills, as well as spotted owls?

36-18 11) Can a map of the proposed old growth areas be provided in the FEIS?

36-19 Finally, I think it is crucial that the inconsistencies between the original and revised recommendations of the Endangered Species Task Force with respect to the habitat requirements of spotted owls be resolved in the Final EIS. If the proposed action or various alternatives are likely to decimate the existing population of owls in the Salem District, then say so, throughout the EIS. If not, then state specifically how such a situation might be avoided. In view of the fact that any owls residing on private land in the area are not likely to receive special consideration, BLM as a federal agency dedicated to multiple use has a special obligation to protect the old growth habitat which remains.

If mistakes are to be made, then err on the side of caution to avoid an irretrievable commitment of resources.

Thank you for accepting my comments, and please keep my name on the list to receive additional information as the decision-making progresses.

Response to comments in Letter 36.

36-1 Appendix C in the DEIS explains these figures.

36-2 Alternative 5 would provide more old growth and mature conifer timber than Alternative 4. It would also provide a more even distribution of old growth, permitting greater genetic flow than in a restricted corridor system as in Alternative 4. A further discussion is found in Appendix C.

36-3 It is true that by retaining only two snags per acre on recently harvested units, current snag deficiencies would not be alleviated. Retention of four snags per acre is essential to rectify existing shortages. This would require on-site inspections and marking of snags by BLM wildlife biologists and timber managers.

36-4 The section on northern spotted owls has been rewritten. (See text revisions for pages 2-23 and 3-36.) Location means habitat units where owls had been located. Some were pairs, some single.

36-5 Economically feasible alternatives are found on page 1-16 of the DEIS, Plantation Protection.

36-6 See text revision for page 3-24, sixth paragraph.

36-7 The basis for determining that only one pair would remain if the new guidelines are correct, is that only one existing habitat block is large enough to support owls on the 1,000 acres basis. There are three other areas that are marginal. Based on new information, the section on spotted owls has been rewritten.

36-8 In Alternative 4, old-growth blocks are located in a corridor; in Alternative 5, they are distributed throughout the SYUs. See Appendix C of the DEIS for more detail.

36-9 Most old growth (85 percent) would remain in place. A map showing existing old growth is available for study at the Salem District Office.

36-10 In most cases, riparian zones do not connect with old-growth areas. As old growth is limited in distribution, most of it was selected for retention regardless of its location.

36-11 These figures vary by alternative and by decade. The percentages are shown in Appendix F.

36-12 See response to comment 4-10.

36-13 BLM biologists believe that viability of all native species would be maintained in the EIS area under Alternatives 4 and 5. These alternatives would maintain all possible successional stages and special habitats in the Westside of the Salem District. The premise is that if habitat is available, species viability would be assured. The proposed action does not include wildlife habitat areas managed for mature timber (125 and 200 years old), thus viability of dependent species may be threatened.

36-14 Yes, see Chapter 1, Monitoring and Studies.

36-15 See response to comment 10-3.

36-16 Safety considerations are a major restriction on BLM's snag retention program. Retaining live, decaying trees rather than dead trees would reduce safety problems and help to realize snag goals.

36-17 If habitat is available for northern spotted owls, the other species are expected to remain viable in western Oregon.

36-18 A map is available for study at the Salem District Office.

36-19 The new recommendations are preliminary and are still under review. It may be some time until a decision is reached. Available information does not permit firm conclusions in this document.

37

September 8, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P. O. Box 2965
Portland, Oregon 97221

Oear Sir:

After reviewing your Draft Timber Management Environmental Impact Statement I am compelled to respond with these comments:

1. It appears the document was written by a preservationist. While reading this EIS the undertones I perceived are that the harvesting of a timber crop and the construction of roads necessary for this harvest would cause irreparable damage to the environment. This certainly is not the case.

2. It indicates that the Salem District has little regard for the O&C Act which dictates the management of 83% of Westside Planning Unit. You are proposing the withdrawal or reduction in harvest on thousands of acres of commercial forest land. This is not in concert with the O&C Act which states ". . . timberlands, and power-site lands valuable for timber, shall be managed, except as provided in Section 3 hereof, for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principle of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities . . .". 37-1

Alternative One or Two best fits the requirements of this Act.

Sincerely,

Darrell Carlson

Darrell Carlson
723D NW Valley View Drive
Corvallis, OR 97330

DC/jt

Response to comments in Letter 37.

37-1 See response to comment 19-1.

38

September 9, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Dear Sir:

I am writing to express my feelings in regard to the "Westside Salem Draft Timber Management Environmental Impact Statement". I appreciate the opportunity to respond to the proposals for westside management, and hope that my ideas and suggestions do not offend those who hold different viewpoints.

The document as written gives me the feeling that the authors have made up their minds that timber harvesting is immoral, and should be reduced to a minimum at any cost. As I interpret the O&C Act of 1937, the primary emphasis of managing timberlands is to be for sustained yield timber production, with consideration for watershed protection, recreation uses and other related resources. Each Alternative that anticipates significant timber harvest is continually bad-mouthed for the negative environmental impacts of logging.

As an example, the statement on page 1-18 under "Comparison of Impacts" which states "Visual resources would be severely degraded under Alternatives 1 & 2," is in my opinion not true in any realistic evaluation. I feel that clearcut units with young reproduction are, if anything, more scenic than large, unbroken expanses of mature or overmature timber.

The preferred alternative emphasizes non-timber activities and resources that will make timber harvesting a relatively minor activity. By reducing the timber acreage base, it would be highly improbable that timber harvest would be kept up to an acceptable level, and community stability could be severely endangered.

I feel that Alternate 1 or 2 would be far more beneficial to the local and regional populations involved, than the preferred alternative. Please place my vote for the harvesting of timber with reasonable and practical harvest methods and scheduling, as the means to derive the greatest benefits for the most people.

Thank you for providing this opportunity for public input.

Sincerely,

Norman L. Marsh

1893 Lexington Circle S.E.
Salem, Oregon 97306

39

STARKER FORESTS

7240 S.W. PHILOMATH BOULEVARD
P. O. BOX 809
CORVALLIS, OREGON 97330
TELEPHONE (AC 503) 929-3877

T. J. STARKER
BRUCE STARKER (1918-1975)
ELIZABETH BOND STARKER
GARY W. BLANCHARD — CHIEF FORESTER
B. BOND STARKER
BARTE B. STARKER

September 4, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

Gentlemen and Ladies:

39-1 We urge you to take another look at your Draft EIS. To revise your employment data to compare full employment under the current plan with full employment under each of the alternatives and to explain more fully the assumptions implicit in the various employment tables.

39-2 We urge the inclusion of at least a summary of your framework plan where many critical land use questions have been considered and decided outside of the Draft EIS.

We recommend a combination of the Draft EIS alternatives No's 2 and 3 as the ones which best meet the needs of the people and comply with the O & C Act. We would suggest the alternative No. 2 land base with the alternative No. 3 timber management program which would hopefully result in an annual cut nearly as high as alternative No. 1.

We remind you that we are not a timber purchaser and, in fact, are a competing timber seller and that it is not in our own short term interest for you to increase your harvest, but we do think it is the right thing for the state's economy and the O & C counties taxpayers.

Thank you for this opportunity to comment.

Very truly yours,

STARKER FORESTS, INC.

B. Bond Starker

B. Bond Starker
President

BBS:sm

FOREST LANDOWNERS AND MANAGERS SINCE 1936

Response to comments in Letter 39.

39-1 Tables 3-17 and 3-19 compare expected employment under the current plan (no action alternative) with expected employment under each of the other alternatives. Tables 3-16, 3-18 and 3-20 compare conditions as they currently exist with expected conditions. The frame of reference most people use in evaluating prospective changes is the way things are now, not how they were a few years ago, or how they would have been if other circumstances had not changed. The impacts in terms of existing conditions are presented to suit the perspective of the general public.

39-2 A Management Framework Plan Summary was published by the Salem District Office and copies were distributed to the public. Public comment on the land use plans in the summary was utilized to develop the proposed action and EIS alternatives identified through the scoping process. Several land use allocation proposals were analyzed in the DEIS. See also response to comment 16-6.

40

INTERNATIONAL PAPER COMPANY

WOOD PRODUCTS & RESOURCES GROUP

WESTERN OPERATIONS

September 8, 1981

BOX 3860, PORTLAND, OR 97208
PHONE 503 243-2211

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P. O. Box 2965
Portland, Oregon 97221

Dear Sir:

Reference is made to the Westside Salem Timber Management Draft Environmental Impact Statement. The proposed timber management plan, we believe, is the most reasonable. With an annual timber sale program of 149MM board feet (conifer and hardwood), the present level of timber sale program of 156MM board feet would substantially be maintained. The proposed action will give adequate protection to fish and wildlife habitat, water and soil quality, and scenic and recreational values.

The proposed action has an intensive timber production base of 176,000 acres on the westside of the district. The harvest/inventory ratio would be approximately 2.8%. This is comparatively low for the high site lands that are in the westside of the district. Hopefully, the allowable cut can be raised in the future as more intensive timber management techniques are being practiced, consistent with proper environmental protection.

We appreciate consideration of these comments in your decision-making process.

Very truly yours,

William J. Barzler

William J. Barzler
Forester, Land Use & Regulations

WJB/gln

NORTH WEST TIMBER ASSOCIATION
1355 OAK STREET • P.O. BOX 5554 • EUGENE, OREGON 97405
TELEPHONE (503) 686-9603

September 8, 1981

Mr. Joe Dose, District Manager
c/o EIS Team
Bureau of Land Management
P. O. Box 2965
Portland, OR 97208

Dear Mr. Dose:

On behalf of the members of North West Timber Association we have analyzed the Westside Salem Timber Management Draft Environmental Impact Statement and are pleased to submit our comments. It is our hope that these comments will not only assist you in preparing a better final EIS, but will help to generate a document that is a better tool in assisting you and the State Director in making a final decision. At your request we have evaluated the document based on the concepts of adequacy, completeness, and accuracy. Unfortunately we find many deficiencies in all these areas and feel that major revisions are necessary in order to produce an acceptable final document.

North West Timber Association consists of small independent plywood and lumber producers throughout western Oregon and southwestern Washington who are highly dependent upon public lands as their source of raw material. Many of our members purchase timber from the Westside unit, and the decision based on the EIS will have a tremendous impact on the survival of these firms. Despite the current economic depression in this industry, we are confident that our member firms can survive and continue to provide the economic base for much of the area's economy provided that the importance of public timber supply and the needs of society are fully recognized in the planning process.

While time and resource constraints do not permit us to do a complete and indepth analysis of all elements of the DEIS we will identify our major areas of concern.

LAND BASE ALLOCATIONS

41-1 To someone who had not been following the entire planning process in detail, it would appear that one of the great mysteries of our time is the disappearance of 29,732 acres of intensive timber management lands. Even when one goes to the appendix he is told only that the removal of the acres are MFP withdrawals "for other resource considerations" (p. A-4). These removals are the most significant action discussed in the EIS and the reviewer should not

have to go outside the EIS to find where the lands have gone or to isolate the effect. Without a full disclosure of the land allocations under each alternative the EIS must be deemed incomplete.

Not only is it essential that the land allocations be displayed, but in order to evaluate potential decisions the environmental consequences (including the human environment) of each individual land category must be displayed.

To correct this problem it is recommended that the final EIS contain the following for each alternative:

41-1
A) The total distribution of the unit acreages, displayed in such a manner that every acre can be accounted for by its dominant use. The MFP withdrawals should be broken out as to dominant withdrawal classification, that is: Riparian, Old-growth Habitat, Visual I, Cultural, etc.

B) The classifications be additive to the unit's total acres - 224,059.

C) The effect of each classification (plus or minus) on the allowable harvest level should be displayed, as well as the effect on employment and public receipts.

D) The display should also show the ACEC proposal acres that are included in each classification.

LAND OWNERSHIP PATTERN

The two area maps enclosed in the back cover packet clearly portray a difficult management situation. It is readily recognized the Bureau lands are widely dispersed throughout the area. With the exception of four or five blocks, agency lands seldom occupy more than 50 percent of any reasonably included area. Approximately 75 percent of the total agency lands appears to be in parcels of 640 acres or less. None of the larger blocks can be described as predominating due to their configurations and/or inclusions of other ownerships. And, of course, it is most apparent that parcel boundaries have been defined by a surveyor's compass rather than topographic features.

Although neither unique to the Agency nor the area, such an ownership pattern increases resource considerations beyond ownership boundaries and decreases management control of extensively-based resources. While sometimes hinted at in the document, there is glaring evidence to suggest the Bureau chose to ignore the effects of this reality. Case in point...the average reader is given elk population change estimates under the various alternatives in Table 3-9. Yet, without knowing what population changes are taking place on adjacent ownerships and the interplay between the ownerships, the reader has no idea of what can be reasonably expected. 41-2

It is very popular to closely tie wildlife populations in with visitor success. In reality, this effects only the ends of the spectrum--when a visitor is forced into looking for the proverbial needle in the haystack or when the particular area is being over-run by the animals. Within the bulk of the

spectrum, however, visitor success depends on the luck and skill of being in the right place at the right time. In respect to the hunters, it matters not if the agency lands contained five times the desired number prior to hunting season if after opening day, the animals departed for adjacent private grounds where no hunting is allowed. Conversely, it matters not if there were no elk prior to opening day if hunting pressure on the adjacent ownerships have driven the elk over on the the BLM lands--it will be happy hunters who are on the agency lands when the elk show up.

Elk mobility is just one example. It is discussed because of its relatively easy-to-grasp nature. But, it does point out the need for a discussion of the land pattern impacts and for a discussion of how the agency used the pattern in reaching their conclusions respective to the various alternatives and the Proposed Action Alternative. We hope this will be accomplished in the Final EIS so we can fully understand the true nature of the impacts. Regarding elk, it would be very helpful if they agency indicated some sort of current population--both on BLM and surrounding lands. It is a bit difficult to weigh the consequences of the various alternatives as listed in Table 3-9 when we are given a percentage change but no starting point. 41-3

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

The manner in which the EIS handles ACECs has very little meaning. All that is known is that nearly 11,000 acres are proposed for special attention and one can almost be assured that when the evaluation is completed the harvest level from the unit will be reduced below what ever comes from the current planning process. At this point it would appear that your ACEC proposals may very well be a significant environmental action and that a full EIS process will be required. This is unfortunate since it prohibits the public from truly knowing what outputs can be expected from the unit lands during the next decade or future decades.

To correct this problem it would appear necessary to develop a range of management plans for each ACEC to be included in this EIS process so that rational decisions can be made. Different alternatives should include various levels of ACEC designation and each potential designation should be evaluated for its needs, benefits, and opportunity costs. 41-4

The Nestucca River proposal is a good example where concern exists. Sightseeing and fishing opportunities are the only rationale presented for the 5,280 acre designation. Considering the mitigating measures that are part of regular Bureau management, we fail to see how ACEC designation will have anything to do with fishing opportunity. Similarly there is no reason for the classification based on scenic values since this issue should be resolved in the regular planning process. The only rationale that appears relevant is if the District staff has decided that they wish to push for Wild and Scenic Classification of the river or to otherwise promote non-management of the lands.

FORESTRY PROGRAM FOR OREGON

41-5 We cannot agree with the evaluation of the relationship of alternatives to the Forestry Program for Oregon as displayed in Table 1-7. Since no reference is given it must be assumed that this table is the viewpoint of the BLM staff and not the State Forester. This should be corrected in the final EIS by requesting the State Forester to prepare the analysis.

ECONOMIC ANALYSIS AND EFFICIENCY

41-6 The Westside planning effort continues what has been a major concern with the BLM planning process--the lack of economic analysis to evaluate land allocations or management prescriptions. Economically efficient management and utilization of our resources is high priority in the current Administration, yet the EIS presents almost no information for the reviewer to analyze the relative efficiency of various alternatives. The use of opportunity cost analysis to evaluate amenity outputs; or the application of marginal cost analysis of everything from producing one more elk to fertilizing natural stands; or an analysis of which alternative maximizes net social benefit are all lacking. As a result, one can hardly expect the decision maker to have all the necessary information before him when the decision is made.

Without knowing what it will cost to preserve habitat for one more pair of owls, or one family of salamanders or to produce one more elk for the hunter, how can the public truly make rational opinions. As a result, emotional decisions may well dominate and emotional public opinion evolves as shown in the public opinion survey.

SENSITIVE, THREATENED AND ENDANGERED PLANTS

While the EIS indicates that no actions which would reduce other resource outputs are likely to occur on the District for plant protection because no threatened or endangered plants are known to occur, we are still somewhat concerned about how the item was handled in the DEIS.

At this time several hundred plants are on lists of one sort or another. Until these lists are reviewed in a scientific and logical manner. they should carry little weight in the management process. Table 2-5 which shows a State Director's List as well as sensitive designation by the District Manager five no indication that development of the list was subjected to any rational analysis which would justify nomination--let alone, consideration for Federal designation. Until an over-all evaluation of a given plant is done, adding names to a list because of relative scarcity on a localized land base is of very little meaning and this should be pointed out in the EIS. Unless the District Manager has a very complete knowledge of the range and abundance of a particular plant, we would seriously question the need or wisdom of his classification of a plant as sensitive. 41-7

CONFLICT WITH THE O & C ACT

For many months the entire planning process of the BLM in western Oregon has been operating in a haze of uncertainty due to conflict over the meaning of

the O & C Act as perpetrated by the Bureau. While clearly many of the proposed land allocations which reduce timber production such as Visual Management I, Riparian Zones, Scenic Areas, and some recreational withdrawals are at best of questionable legality, the conflict is particularly emphasized by proposed old-growth withdrawals.

The EIS (p. 2-28) points out that O & C lands cannot be considered in the Wilderness Review Process because of the provision in FLPMA which provides that in areas of inconsistency between FLPMA and the O & C Act that the O & C shall prevail. Plain and simple, wilderness is illegal on O & C commercial forestlands because it precludes management of the areas for timber production. There is very little, if any, difference between designation of an area as Wilderness and withdrawing it from timber management in order to provide an old-growth habitat for a Northern Spotted Owl. In both cases, the objective is to have an eco-system which is, or mirrors, a natural unmanaged stand. Spotted Owl habitat is only more specific in that the stand must have certain old age characteristics.

41-8 Despite this clear conflict and significant doubt over the legality of preserving the old-growth for owls or other wildlife purposes, no mention is made of the conflict in the EIS. The manner in which this conflict is conveniently ignored represents a significant bias on the part of the planners. To correct the situation, it is recommended that the Final EIS contain a statement clearly showing that the old-growth allocations and that they may very well be illegal under the laws and regulations which mandate the operation of the District.

WILDLIFE CONCERNS

While specific comments on the treatment of elk and Northern Spotted Owl management in the EIS will be presented, some general concerns with the over-all handling of wildlife in the EIS are needed.

In analyzing the effect of various management practices on wildlife, the document could best be described as a Negative Environmental Impact Statement. The discussion is dominated by the negative things that management will do to some populations in the wildlife community with only casual mention of those creatures which will be unaffected or may benefit. The discussion concentrates on a few specific animals giving the reader the impression that management will all but wipe put the area's wildlife. The vast majority of the public which enjoys wildlife is more concerned seeing birds and animals in the woods than with specific animals which may be less common. To see a deer, bluejay, snake, frog, or squirrel is more important and satisfying to the vast majority of people than to have searched and seen a Northern Spotted Owl or Red Tree Vole.

The Final EIS, rather than concentrating on a few specific snimals, should seek to treat all wildlife equitably showing the effect of various land allocation schemes and management practice on actual population levels for
41-9 all the species. Also, much more discussion of population management or or possible mitigating practices is needed.

41-10 A much more detailed discussion of Riparian Zones and the cost and benefits of various management schemes is needed in the FEIS. While stream-side buffer strips are discussed, the EIS is lacking in necessary discussion of various widths and yields analyzed and included in the plan.

Table 2-8 indicates that while fish habitat on the Oistrict is improving the salmon populations continue to decrease. This indicates that the problem may be outside of BLM control. Table 3-1D, however indicates that very significant increases in the abundance of Salmonids can be expected on the Oistrict under
41-11 the preferred alternative and several others. Not only is there no justification given for Table 3-1D figures, but the conclusion of increased population conflicts with the current trends.

ELK MANAGEMENT CONCERNS

The Bureau seemed to have three main concerns about impacts of any alternative on the elk within the area. First, elk were repeatedly tied in with necessary retention of old-growth because of its alleged importance in providing survival cover. Second, there was worry abbut the denial of use by the animals on those areas within one-half mile of roads. Third, because of increased access, there is fear elk harassment will become a problem. We believe there was a good deal of bias in building these cases and we wish some other considerations were made in the FEIS.

We believe the defense of old-growth retention for survival cover to be used by elk during severe winters to be agency subscription to "worst case" management. It is no more valid, in our opinion, than it would be to develop a campground construction program based solely on demands seen during the Memorial Day, Fourth of July, and Labor Day weekends. We accept your statement on page 3-17 (old-growth is also a necessary component of elk habitat) when you present evidence in reference form citing species elimination over long periods of time brought about by the elimination of just the old-growth component. The fact that elk have regularly been seen in the devastated area of Mount St. Helens suggests that the animal will respond as any organism will in occupying a vacant niche when one exists. The fact that elk have successfully adapted to the Clatsop area suggests they can survive in areas devoid of old-growth.

If the agency is concerned about some animals perishing, we submit it is up to the Oregon Department of Fish and Wildlife to provide for the animals during unusual climatic situations as was done in Colorado during the winter of '78-'79. While the Department may justifiably worry about the expense involved in feeding elk during severe times, we likewise worry about the financial returns foregone in withdrawing good timberlands for the sake of creating more old-growth. At the very least, a comparison of financial trade-offs should be analyzed between infrequent winter feeding and the value of timber foregone by retaining and promoting old-growth. Otherwise the document remains incomplete and potentially imprudent.

As for the elk use denial of areas within one-half mile of roads as claimed by the agency (p.3-17) we concur research has adequately pointed out a reduction of use does take place to various degrees along open roads and

that under given sets of circumstances, the problem can be quite severe. But, we as strongly maintain the question is not "should there or should there not be roads?" -- rather, "recognizing the use and management benefits of roads, how can we best control traffic so that there is not significant impacts as a result of roads?" This point is not limited to elk, but extends to maintaining water quality, maintaining visual quality, and providing two-way protection between timbermen and visitors.

The whole road issue was a mute topic twenty years ago, but that is not the case today. Nor is it likely to go away in the face of increasing area populations and increasing visitation. Whether we wish to acknowledge it at this time or not, traffic control is not only going to need our philosophic attention but our money and effort as well. We do not particularly sympathize with the author as he expounds on the difficulty of closing roads on page 3-17. That has become part of the job. We do sympathize with the men on the ground if they are not receiving genuine support on this matter from above.

41-12 Research has shown that where areas witnessed reduced elk use within one-half mile of open roads, once closed, use resumed to a basically pre-roaded situation. This was not pointed out in the text, and we feel this deletion tends to sway public opinion to a position of being against road construction and is therefore biased. We look for this to be rectified in the FEIS.

Closely tied to the road issue is the wildlife harassment problem. We acknowledge wildlife have in fact been shot out from certain areas by poachers. Generally, the closer to elimination the numbers are, the more apt a poachable species is to disappear. But, it is our contention that, physically speaking, roads fall under management while harassment falls under law enforcement (an administrative entity). We expect employees of BLM to be sensitive to violators of game laws, but we do not consider it the responsibility of the agency to get into the program of capturing violators. This properly falls under the responsibility of the State and only demands full support of the agency. There may need to be investments made by the agency so that surveillance increases on BLM roads, but the State needs to be encouraged to review its priorities of expenditures. If the conclusion is reached that additional surveillance is not comparatively important, then increased harassment will have to be accepted. It does not logically fall to the agency to sweepingly close roads in the name of harassment control.

We believe there is justification for the agency elaborating on road closures so the public knows precisely what is involved. We hold, for instance, that there is a spectrum of options--including permanent closures, climatic
41-13 closures, seasonal closures, specific use access privileges, and permanently open to public use. This could have been addressed properly in this document as it determines how much public support can be expected and this support will have more effect on wildlife than haggling over the differences between "x" amount of acres of habitat enhanced and "y" amount--within practical limits.

We do believe the document should show, either in the main body or as an appendix, two graphs connected with elk. First, to get a handle on what has

41-14 happened to the elk population in the area over the past 3D or 4D years, we should like to see a line graph showing the increases and decreases at five year increments as the country's forested character changed. If there were dramatic decreases in the population, we should like to see some discussion as to why these decreases took place. Also, we should like to see a line
41-15 expressing management desires in terms of elk numbers. Obviously because of their mobility, it would be valueless to speak in terms of only elk on BLM land; the area population must be addressed.

41-16 Then, we would like to see a vertical bar graph using the same years to show a breakdown of what occurred to the population to the best of your knowledge--using those years as reference points. The bars should be subdivided into natural cause deaths, poaching losses, legal harvests and prenatal numbers (basing the year on a calving-to-calving basis rather than a non-biologic one). Of course it is realized, the numbers will probably have to be best estimates, but we submit an estimate is greatly preferred to a shrug of the shoulder.

NORTHERN SPOTTEO OWL

The information presented in the DEIS related to the Northern Spotted Owl is extremely important as it demonstrates quite clearly that the Spotted Owl Management Plan dictated by the Inter-agency Committee is of extremely questionable validity. Unfortunately and contrary to indications to industry from the State Office, the District has ignored the major conflicts and accepts the SOMP per se. This must be corrected in the final statement.

Threatened And Endangered Species

Within the EIS the discussion of the Northern Spotted Owl is handled as part of the discussion of Threatened and Endangered Species. While the EIS does point out that the owl is a State listed species and not a Federal one, the failure of the EIS to describe the difference is deceiving. To the general public Threatened and Endangered carries an image which is far different than the meaning used for State designation. The EIS should completely separate State from Federally classified species, and point out that the State classification is simply an action by the Fish and Wildlife Commission which totally lacks the evaluation of need that is associated with the Federal classification process.

On page 3-3D the EIS states that if the Salem District manages for seven pairs of owls and no one else provides for the owl then "the species would certainly be in danger and be considered for Federal status." This blatant worst-case threat, while a favorite tool of some advocates, is not justified. It is ridiculous to assume that no other agency or BLM District would provide for the owl while the Salem District did. More importantly, with the amounts of suitable habitat existing in areas already withdrawn from timber management across the northwest and the large amount of old-growth in some areas of managed forest, there is a reasonable doubt whether the species could qualify for federal listing if the agencies make no further withdrawals of commercial forestland. The statement in the EIS should either be dropped or more fully explained with the real risks described.

Old-Growth Oependence

On page 3-27 the EIS states that the Northern Spotted Owl is "dependent on old-growth closed-canopy forests..." In the Glossary (G-7) Old-growth Oependent is defined as "An animal species so adapted that it can exist only in old-growth forests." While there is certainly more evidence that the spotted owl prefers old-growth, it is no more than an unproven theory that the owl needs it to exist, i.e., that he is really dependent. One researcher has kept an owl in urban captivity for several years and the bird still "exists." This means little since no attempt has been made to breed and maintain a population under captive conditions. However, the growing information on the owl shows that the species is found in viable numbers in other than the old-growth Oouglas-fir forests which the BLM says they are dependent upon for existence.

Clearly the BLM should be more objective in its analysis of the owl, and point out to the public what is fact and what are only theories. It is discouraging that BLM professionals have totally ignored a basic part of the scientific method and have chosen to accept unproven theories as fact, rather than striving to find the facts needed to evaluate the theories.

Inventory Oata On The Owl

It would seem that before any rational decisions can be made regarding the dedication of high valued resources for the owl that a complete inventory
1-17 is needed. The EIS indicates that 26 pairs have been found on the BLM lands in the unit and 48 pairs on other ownerships. The EIS does not, however indicate how complete of an inventory this may represent. The State Office has indicated that for the overall Salem Oistrict only 20 percent of the Oistrict and 50 percent of the old-growth had been inventoried as of April 19B1. It also seems probable that the owl count for other ownerships is grossly incomplete since the majority of the lands are in State, County, and private ownership where little, if any, inventory work has been undertaken.
1-18 In order for the EIS to be considered either complete or accurate, the quality of the inventory which produced the 74 owl inventory should be revealed.

Acres Per Pair Of Owls

The information in the E1S presents some interesting questions about the reliability of the Spotted Owl Management Plan and the acre designations
1-19 being used. The EIS indicates that the Oistrict only has 5,700 acres of "old-growth" using the 19S year age break. At 300 acres/pair this should only sustain 19 pairs of owls and at 1,000 acres no more than six pairs could exist. Yet the inventory, which is likely incomplete, shows that 26 pairs are supported or one pair for each 219 acres of old-growth.

The EIS also indicates that some 6,100 acres of mature timber exists which has some characteristics for old-growth, and under the preferred alternative will be "managed" to increase the old-growth component. If this added acreage is assumed to be partially responsible for the high-owl-to-old-growth ratio, then one must once again question the validity of the Spotted

Owl Management Plan. That plan first indicated that the timber must be at least 200 years old and in the revised plan raised the old-growth age to 250.
41-20 Under this concept the 6,100 acres of mature stands aged 115 to 195 should not support any owls.

The purpose of the planning process and the E1S is to develop the necessary information for good rational decision making. One of the key decisions will be how much, if any, old-growth will be maintained for the owl. The EIS clearly shows that the assumptions and information presented in the Interagency Spotted Owl Management Plan is of very questionable validity. As has been clearly indicated by the State Oirector, the BLM is under no obligation to follow the SOMP nor to make any special management decisions related to benefiting the spotted owl. The Final E1S should strive to display all the facts necessary to evaluate the various alternatives, from no special provision to the triple habitat prescription contained in the preferred alternative. The analysis should clearly show the facts concerning both the
41-21 biological issue and the economic values involved. Contrary to the Coos Bay EIS, it is impossible to determine the resource trade-offs that are associated with the owl program in the Salem Westside.

SOC1AL ANO ECONOMIC 1MPACTS

The EIS section on the 1mpacts on Socio-economic Conditions was in part developed with an objective in mind--to try to justify a reduction in the harvest level through the preferred alternative. After all, who could argue with a preferred alternative that reduces the harvest level by 10 million board feet per year yet increases employment by over 600 jobs?

This absurdity, of course, results by attempting to take advantage of the current economic depression in the industry and comparing the average harvest per year in the preferred alternative with a low two-year period under the current harvest. If the economic cycle had been different, and the 1973 (Figure 3-2) harvest had occurred in 1976, would the E1S have shown that the preferred alternative would reduce jobs by over 3,000? We doubt it.

41-22 If the analysis is going to use average annual sale as the predictor for average annual harvest (a proper approach), then the same standard should be used for the past decade. In short, Table 3-16 and the logic associated with it should be completely dropped from the EIS.

It was good to see that the projections related to the O & C county funds did reflect a more current stumpage value. However, the manner in which the data is displayed as precent supplement to levies makes it difficult for the
41-23 average person to recognize the magnitude of the impact. The Final E1S should either supplement Table 3-21 or replace it with one which simply shows total timber receipts and the dollar amount which will go to each county.

The use of the Tiff Harris survey is of questionable value. No indication is given about the characteristics of the sampled population, or the statistical validity of the difference between percentages favoring one output

over another. Contrary to the statement on page 3-56, the only conclusion that seems valid from the survey results is that over 75 percent of the people in Oregon and the Willamette Valley want as much or more of everything except snowmobiles and ORVs.

It is our hope that these comments will not only assist you in preparing a more acceptable Final E1S, but more importantly that an improved statement will assist you in making the best possible decision.

Sincerely yours,

Dennis Hayward

Oennis Hayward, Field Forester

Huck Gaylord

Huck Gaylord, Field Forester

bjm

cc: Bob Burford, Washington, OC
BLM office, Salem

Response to comments in Letter 41.

41-1 See response to comment 16-6.

41-2 Population changes on other ownerships could only be predicted on a site by site basis using existing and predicted habitat structure. While this may be possible to do in aggregrate for the whole area it is not currently possible to do so on intermingled lands.

41-3 The Oregon Department of Fish and Wildlife estimates elk densities of 2.8 per square mile in the area. This means approximately 1,000 elk on Bureau-managed lands in the SYUs.

41-4 The DEIS analyzes a proposed action and alternatives which vary in levels of ACEC designation. The analysis of ACEC designation ranges from no areas under Alternatives 1 and 10 to 15 areas (totaling 11,175 acres) under Alternative 5. Variations in boundaries and management actions for individual areas are presented in the proposed MFP (available for review in the Salem District Office).

41-5 See comment letter 11 and revisions for page 1-27, Table 1-7.

41-6 The economic efficiency of alternative management plans will be included in the preparation of the decision document.

41-7 Bureau policy is to protect, conserve and manage candidate listings of sensitive plant species (Instruction Memo WO-80-722). The sensitive plant species listed in the Draft EIS (Table 2-5) are either valid candidate species for proposed listing according to the U.S. Fish and Wildlife Service and/or they are those species considered to be consistent with BLM policy direction (Instruction Memo OR-81-568 and WO-80-722). The five species designated "sensitive" by the Salem District Manager are on the State Director's "Oregon Interim State Taxa List". The Salem District Manager exercised his option to include these five species because they were determined by botanical professionals in Oregon to be in need of protection.

41-8 See response to comment 19-1.

41-9 The effects on any species can be seen by looking at their habitat requirements in Appendix D and then at the changes in habitat predicted in Appendices E and F. Data on population levels of most species is inadequate to permit quantification of effects on them. Population management is a function of the State. Mitigation has been addressed where possible.

41-10 The information which is available or could be developed is not sufficiently precise to make the suggested analysis useful.

41-11 Current trends would be modified by the selection of any alternative. The figures in Table 3-10 are based on habitat conditions. The methodology is available at the Salem District Office.

41-12 See text revisions for page 3-17, Paragraph 3.

41-13 BLM has utilized road closures in the past as an elk management tool. We have accomplished this in close cooperation with private owners and other public agencies. We will continue to look at road closures to enhance elk numbers. However, closing roads is only one technique to manage elk. Habitat modification to provide the best mix of forage and cover is the best method to effect increases in elk herds.

41-14 Population estimates going back 30-40 years do not exist, according to Oregon Department Fish and Wildlife.

41-15 The Oregon Department of Fish and Wildlife has an interim management goal of eight elk per square mile in elk habitat.

41-16 The only data available pertain to legal harvest.

41-17 All BLM-administered land in the SYUs that contained habitat capable of supporting owls has been inventoried.

41-18 Inventory work on BLM-administered land is complete and on U.S. Forest Service land is about 90 percent complete. Land in State ownership has not been as intensively inventoried but little old growth exists on these. Inventories on privately owned lands have been conducted where private lands intermingle with the public lands being surveyed.

41-19 See the revised section on spotted owls, text revisions for pages 2-23 and 3-28.

41-20 See the revised sections on spotted owls (text revisions for pages 2-23 and 3-28) and response to comment 27-16.

41-21 The Westside Salem planning area involves a greater variety of multiple use conflict issues than does the Coos Bay District. It was, therefore, not practical to design and analyze in the EIS a separate alternative to address each multiple use issue. The spotted owl allocations in Alternative 3 of the Westside Salem EIS have a basis similar to that of Alternative 2 in the South Coast-Curry EIS. If such allocations were applied to the WSSYUs, they would cause a reduction of 2.2 MM bd. ft. in annual timber harvest from the level shown in the Westside Salem Alternative 2.

41-22 See response to comment 11-3 regarding the base period chosen. See response to comment 39-1 for further discussion.

41-23 The impacts on O&C distributions were presented in terms of percentages of total property tax levies in order to show how local governments would be affected in terms of their principal discretionary revenue source. The following table shows the distribution of O&C revenues from Westside Salem lands which would occur for the various harvest levels valued at the FY 1980 average sale price.

Distribution of O&C Receipts from Westside Salem SYUs to Counties 1/
(Thousands of dollars)

County	Existing Condition (1975-77) 2/	Proposed Action	Alt. 1 Max. Tbr.	Alt. 2 Str. Tbr.	Alt. 3 Emp. Tbr.	Alt. 4 Emp. Other	Alt. 5 Full Eco.	Alt. 6 Lo MHS	Alt. 7 Hi MHS	Alt. 8 No Herb.	Alt. 9 No ACE	Alt. 10 No Action
Benton	$ 538	$ 641	$ 803	$ 759	$ 702	$ 606	$ 421	$ 667	$ 601	$ 628	$ 487	$ 685
Clackamas	1,063	1,266	1,586	1,500	1,387	1,196	832	1,318	1,188	1,240	962	1,352
Columbia	394	470	589	557	515	444	309	489	441	460	357	502
Coos	1,130	1,345	1,686	1,594	1,474	1,272	885	1,401	1,262	1,318	1,023	1,438
Curry	699	832	1,043	986	912	787	547	867	781	815	633	889
Douglas	4,797	5,712	7,160	6,769	6,260	5,399	3,756	5,947	5,360	5,595	4,343	6,103
Jackson	3,001	3,573	4,479	4,234	3,916	3,377	2,350	3,720	3,353	3,500	2,717	3,818
Josephine	2,313	2,755	3,453	3,264	3,019	2,604	1,811	2,868	2,585	2,698	2,094	2,943
Klamath	448	534	669	632	585	504	351	556	501	523	406	570
Lane	2,924	3,482	4,364	4,126	3,816	3,291	2,290	3,625	3,267	3,411	2,647	3,721
Lincoln	69	82	103	97	90	78	54	85	77	80	62	88
Linn	506	602	755	713	660	569	396	627	565	590	458	643
Marion	280	333	417	394	365	315	219	347	312	326	253	356
Multnomah	209	249	312	295	272	235	163	259	233	243	189	266
Polk	414	493	617	584	540	466	324	513	462	482	374	526
Tillamook	107	128	160	151	140	121	84	133	120	125	97	136
Washington	121	144	180	170	157	136	94	150	135	141	109	154
Yamhill	138	164	206	195	180	155	108	171	154	161	125	175
Total	$19,149	$22,803	$28,582	$27,020	$24,990	$21,554	$14,994	$23,740	$21,398	$22,335	$17,337	$24,365

1/ O&C receipts were estimated as the portion of total harvest derived from O&C lands, valued at average sale price for Westside Salem in FY 1980.
2/ Existing condition represented by 1975-77 average harvest of 122.6 million board feet valued at FY 1980 average sale price.

42

John L. Timm
473 E. Vine
Lebanon, Or 97355
Sept. 8, 1981

Mr. Joe Dose, District Manager
c/o EIS Team (922)
Bureau of Land Management
PO Box 2965
Portland, Or. 97221

Reference: Draft EIS
Westside Timber Mgmt.

Dear Joe,

As a forester I felt betrayed by the Draft EIS. Many of the statements were misleading and not verified by the available data. It is prejudiced in favor of the specialists' fields, wildlife, soils, water, fish, etc; timber harvest is considered detrimental in most cases with little emphasis on the many benefits to all.

The O+C Act states that the land must be managed for permanent forest production etc. Presumably, this has been done to date and yet the preferred alternative proposed
42-1 a much reduced land base and reduced harvest due to preservation of old growth stands for the benefit of elk and spotted owls without considering the O+C Act.

I favor alternative one because it best follows the concepts set forth in the Act.

Sincerely,
John L Timm

Response to comments in Letter 42.

42-1 See response to comment 19-1.

43

Corvallis Area Chamber of Commerce
350 S.W. Jefferson Street Corvallis, Oregon 97330 Phone: 757-1505

September 4, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland,
OR. 97221

Dear Sir:

The Corvallis Chamber of Commerce has historically been concerned with the well-being of our community and county, its citizens, and the commerce supporting these. For this reason, we are submitting these comments on the Bureau of Land Management's Draft Timber Management Environmental Impact Statement.

Administration of these Bureau of Land Management lands is guided primarily by two major federal laws, the Federal Land Policy and Management Act of 1976 (FLPMA) and the Revested Oregon and California Railroad Grant Land Act of 1937 (O & C Act). This latter act states that lands classified as timberland are to be managed under sustained yield principles in order to provide a permanent source of timber supply, protect watershed, regulate streamflow and to provide recreational facilities. While provisions of the O & C Act are generally in accord with those of the FLPMA, and FLPMA states that where conflicts or incompatibilities between the two statutes may exist, the O & C Act shall prevail. Although your Draft EIS acknowledges the O & C Act it does not follow it. We are deeply concerned because the proposed action seems to be in conflict with these federal laws and with the best interests of local and Western Oregon citizens.

Much emphasis has been placed on withdrawing lands from those to be managed for timber and timber harvest. Each withdrawal can adversely effect jobs, income, county revenues, and the dollars which ripple through our community as "economic multipliers."

According to EIS, if the preferred alternative is adopted, the result would be a loss of 168 jobs as compared with a continuation of current management, (Re: Table 3-17). Yet in one table this alternative is shown to create 631 jobs which is misleading because this comparison has been made with the current depressed level of employment. (Re: Table 3-16).

"Corvallis-Heart of the Willamette Valley"

FIVE YEARS ACCREDITED CHAMBER OF COMMERCE

Page 2

The Corvallis Chamber believes that the long-term welfare of this community depends upon the BLM lands in this area being managed intensively for maximum output of timber, with appropriate consideration for wildlife protection and recreation opportunities. These activities must be carried out in such a way that watersheds and soil productivity remain intact. Alternative one or two would be more in line with these goals.

Respectfully,
Ken Medearis
Ken Medearis
President

KM:jw

cc: Senator Mark O. Hatfield
Senator Robert Packwood
Representative Les AuCoin
State Senator Cliff Trow
State Representative Tony Van Vliet

Response to comments in Letter 43.

43-1 See response to comment 19-1.

43-2 The table shows that the annual cut under the proposed action would provide 631 more jobs than have been provided by WSSYUs harvests in the recent past. The comparison is with 1975-77, not the current depressed level of employment. See the response to comment 11-3 for discussion of harvest base period.

INDUSTRIAL FORESTRY ASSOCIATION

WEST COAST TREE FARM

225 S.W. BROADWAY / RM. 400
PORTLAND, OREGON 97205

September 15, 1981 *Telephone:* (503) 222-9505

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

SUBJECT: Westside Salem Draft Timber Management
Environmental Impact Statement

Dear Sir:

As mentioned at the Public Hearing held August 25, 1981, we are submitting the enclosed economic data we think is needed in the Draft Environmental Impact Statement.

Enclosed you will find tables showing benefits, costs and net present values using various discount rates for all the alternatives in your Draft Environmental Impact Statement. All base data was obtained from your staff whom we sincerely thank for their cooperation.

Only those benefits and costs related to basic resources which provide food, shelter and jobs were considered. You will find only the timber and commercial fishery resources used in our analysis. Sport fishing and hunting use are recreational pursuits which are really extremely difficult to relate to the land base and user involvement and are only used by the public as long as they have jobs to support the type of recreation they are interested in.

Table I is a summary of our analysis. We used the average bid value for all species and harvest methods for FY 1979-80 in the Planning Area. Fish benefits were based on commercial fish landings in the administrative district within the Planning Area for 1980 furnished by the Department of Fish & Wildlife in a report dated May 1981. The total value was prorated between the percent of land owned by BLM within the planning area boundary.

Table II shows benefit/cost ratios that express total amount of benefit for one dollar of cost. For example, using a discount rate of nine percent, Alternative 1 shows for every dollar spent, a return of $3.43. Approximately 100 percent greater return than shown in Alternative 5.

Table III shows net present values by several discount rates and alternatives. All alternatives showed a positive value, which is the maximum amount of money a landowner could spend on management opportunities, in addition to those already used in the analysis and still give the indicated rate of return (discount rate).

For example, using a nine percent discount rate, Alternative 2 gives the maximum amount of money that could be spent on management opportunities and Alternative 5 is the least beneficial. Alternative 2 provides a net present value approximately three times greater than Alternative 5.

Tables 2 and 3 were developed using the following assumptions. One, that benefits were increasing one percent faster than costs and that value received would begin in five years.

44-1 It is apparent that the BLM needs to make some decisions to incorporate this type of analysis in the process. First, the question: "What is the proper discount rate?" We prefer that a range of rates be used. The maximum rate could be 7-3/8 percent which is the current rate being used by the U.S. Water Resource Council. The minimum rate would be somewhere around four percent. Also, you would need to assess at what rate benefits would increase in relation to costs. At the present time, the Forest Service uses 2 percent in their planning process.

One of the problems with the DEIS is that it is difficult for a reviewer to ascertain how impacts will be mitigated. All the alternatives appear environmentally sound, but there is no attempt to mitigate the alternatives economically and as related to the O&C Act. The Act states..."Permanent source of timber supply protecting watersheds, regulating stream flow and contributing to the economic stability of local communities and industries and providing recreation opportunities." Since timber must be "sold, cut and removed" to realize any opportunities to provide the above mentioned use, it is important that decision-makers are knowledgeable about costs and benefits. You should be planning for more intensive management of the timber resource or better campground facilities of which the costs will have to come from the value of the timber.

We would be pleased to submit any other information you may need.

Sincerely,

Philo Gregg
District Forester

PG:lf
Encls.
cc: Jerry Gruber

I F A

By: Industrial Forestry Association
Sept. 1981

TABLE I

ECONOMIC ANALYSIS
WESTSIDE SALEM DRAFT EIS

Timber to be harvested 1985-1995

1/ Accomplishments FY 1972-1980

Alternatives

BENEFITS - Annual	P.A.	1	2	3	4	5	6	7	8	9	10
Timber Harvest											
Conifer Volume	146MMBF	183MMBF	173MMBF	160MMBF	138MMBF	96MMBF	152MMBF	137MMBF	143MMBF	111MMBF	156MMBF
Hardwood Volume	3MMBF	7MMBF	3MMBF	3MMBF	3MMBF	3MMBF	3MMBF	3MMBF	3MMBF	3MMBF	-0-
Total Stumpage Value	53,342,000	68,020,000	61,934,000	58,354,000	50,478,000	35,442,000	55,490,000	50,120,000	52,268,000	40,812,000	55,848,000
Commercial Fisheries	507,000	507,000	507,000	507,000	507,000	507,000	507,000	507,000	507,000	507,000	507,000
1st Year TOTAL Benefits	53,849,000	68,527,000	62,441,000	58,861,000	50,985,000	35,949,000	55,997,000	50,627,000	52,775,000	41,319,000	56,355,000
COSTS - Annual											
Timber Management											
Harvest(All Silv. Prescr.)	10,919,000	13,923,000	12,897,000	11,945,000	10,332,000	7,255,000	11,358,000	10,259,000	10,699,000	8,354,000	11,432,000
Site Preparation											
Broadcast Burn	518,000	689,000	593,000	551,000	481,000	354,000	534,000	489,000	500,000	407,000	480,000
Manual	N/A										
Mechanical	65,000	74,000	65,000	64,000	58,000	45,000	65,000	64,000	65,000	64,000	65,000
Stand.Conversion	15,000	12,000	18,000	18,000	16,000	10,000	15,000	15,000	15,000	15,000	23,000
Planting											
Initial	267,000	356,000	302,000	288,000	252,000	182,000	277,000	251,000	262,000	204,000	275,000
Replant or Interplant	123,000	163,000	143,000	132,000	115,000	83,512	127,000	115,000	120,000	100,000	126,000
Plantation Protection	105,000	107,500	100,500	100,500	90,500	68,500	100,500	100,500	100,500	100,500	100,500 1/
Plantation -	64,000	76,000	71,000	66,000	57,000	41,000	64,000	57,000		46,000	
Mtn & Release	6,000	6,000	6,000	6,000	6,000	6,000	6,000	6,000	20,000	6,000	92,000 1/
Precommercial Thinning	36,000	39,000	37,000	36,000	32,000	32,000	36,000	36,000	36,000	36,000	81,000 1/
Fertilization 1/	18,000	20,000	19,000	19,000	15,000	14,000	18,000	18,000	18,000	18,000	-0
TM Labor Costs	1,018,000	1,298,000	1,202,000	1,113,000	963,000	676,000	1,641,000	956,000	997,000	779,000	1,065,000
Transportation											
New Construction	1,041,000	1,077,000	1,041,000	1,041,000	860,000	650,000	1,041,000	1,041,000	1,041,000	1,041,000	1,041,000
Reconstruction	286,000	286,000	286,000	286,000	286,000	286,000	286,000	286,000	286,000	286,000	286,000
Maintenance	3,320,000	4,347,000	3,921,000	3,632,000	2,718,000	1,562,000	3,454,000	3,119,000	3,254,000	2,540,000	3,476,000
Fisheries-Riparian	2,613,000	No CFL	-	2,291,000	2,255,000	1,718,000	2,613,000	2,613,000	2,613,000	2,613,000	143,000
Research Nat.Areas	394,000	-	-	215,000	215,000	501,000	394,000	394,000	394,000	394,000	-
Visual	215,000	-	-	322,000	322,000	2,220,000	215,000	215,000	215,000	215,000	179,000
Rec. & Lands	394,000	-	-	251,000	286,000	3,401,000	394,000	394,000	394,000	394,000	251,000
Outstanding Nat.Areas	107,000	-	-	71,600	107,000	107,000	107,000	107,000	107,000	107,000	-
Sightseeing	36,000	-	-	-	36,000	18,000	36,000	36,000	36,000	36,000	-
Wildlife	3,831,000	107,000	72,000	752,000	3,473,000	12,387,000 ~~10,000~~	36,000	36,000	36,000	36,000	-
Misc.	537,000	72,000	36,000	-	-	-	537,000	537,000	537,000	537,000	-
TOTALS	25,928,000	22,652,500	20,809,500	23,200,100	22,975,500	31,617,012	27,149,500	24,939,500	25,540,500	22,123,500	19,115,500

TABLE II

BENEFIT/COST RATIOS BY DISCOUNT RATE
FOR EACH ALTERNATIVE IN THE WESTSIDE
SALEM DRAFT EIS

DSCT RATE	PA	1	2	3	4	5	6	7	8	9	10
3	2.68	3.90	3.87	3.27	2.87	1.47	2.66	2.62	2.67	2.41	3.81
6	2.47	3.60	3.57	3.02	2.65	1.35	2.45	2.42	2.46	2.22	3.51
9	2.36	3.43	3.41	2.88	2.52	1.29	2.34	2.30	2.35	2.12	3.35
12	2.30	3.34	3.32	2.80	2.46	1.26	2.28	2.24	2.28	2.06	3.26
15	2.26	3.29	3.27	2.76	2.42	1.24	2.24	2.21	2.25	2.03	3.21

TABLE III

NET PRESENT VALUES BY DISCOUNT RATE
FOR EACH ALTERNATIVE IN THE WESTSIDE
SALEM DRAFT EIS

Dollars/Acre

3	714	852	859	805	684	309	740	662	698	511	758
6	353	431	434	404	340	132	366	327	345	250	383
9	220	272	274	254	213	73	228	203	215	155	242
12	156	195	197	181	152	48	162	144	153	110	174
15	120	151	152	140	117	35	124	111	117	84	134

Response to comments in Letter 44

44-1 Discount rates of 4, 7-3/8 and 10 percent are used in calculating benefit/cost ratios. In cases where the proposal involves future timber yields, stumpage prices are assumed to increase 2 percent per year relative to the composite wholesale price index for the United States.

Industrial Forestry Association
September 14, 1981

45

United States Department of Agriculture

Soil Conservation Service

1220 S.W. Third Avenue
16th Floor
Portland, OR 97204

September 15, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, OR 97221

Dear Sir:

We have reviewed the Westside Salem Timber Management Draft Environmental Impact Statement and have no comments to offer.

Thank you for the opportunity to review and comment on this draft.

Sincerely,

GUY W. NUTT
State Conservationist

cc: Chief, SCS, USDA, Washington, DC 20013

The Soil Conservation Service is an agency of the Department of Agriculture

SCS-AS-1
10-79

46

Willamette Industries, Inc.

Building Materials Group
Sales and Operations Office

P.O. Box 907
Albany, Oregon 97321
503/926-7771

September 8, 1981

Salem District Manager
c/o EIS Team (922)
Bureau of Land Management
P.O. Box 2965
Portland, Oregon 97221

Gentlemen:

Re: Westside Salem Proposed Timber Management

Willamette Industries, Inc., has reviewed the Draft Environmental Impact Statement for the Westside Salem Timber Management Plan and we are submitting these comments for your consideration.

First, we are disturbed by the general tenor of your draft. Your presentation implies it is wrong to harvest timber and, in many cases, the presentation is completely misleading. For example, on page 3-6 the first sentence of the first paragraph states "Road building increases erosion 125 times over natural levels (Swanston and Swanson 1976) when slopes are overloaded with excess material and fail, and when runoff is redirected and channeled onto steep side-slopes, creating new drainages." By inserting the reference between the fact and the qualifying statement you break the thought of the reader and tend to imply all road building increases erosion 125 times the natural level. Your next paragraph does exactly the same thing. In dealing with employment you compare your proposed alternative with the current depressed employment level and state your alternative will create 631 jobs. This masks the actual impact of the 168 jobs lost as a result of the 10 million board foot reduction in harvest being proposed.

46-1 We also are appalled at the apparent disregard the Salem District has for the "O&C Act." Administration of these Bureau of Land Management Lands is guided primarily by two federal laws, the Oregon & California Act of 1937 (O&C Act) and the Federal Land Policy and Management Act of 1976 (FLPMA). The O&C Act states that O&C lands classified as timberland are to be managed under sustained yield

46-1 principles in order to provide a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of the local communities and industries, and providing recreational facilities. If any conflicts or inconsistencies occur between these Acts, the O&C Act shall prevail. 83% of the lands within the Westside planning unit are O&C lands, yet you are proposing setting aside thousands of acres for old growth management. We feel that this is contrary to the mandates of the O&C Act.

The long-term welfare of the dependent communities requires the BLM lands to be managed intensively for maximum output of timber. We would therefore recommend Alternative One over the alternative you propose.

Thank you for the opportunity to respond to this draft Environmental Impact Statement.

Sincerely,

WILLAMETTE INDUSTRIES, INC.

John W. Davis, General Manager
Western Timber & Logging

DC/jt

Response to comments in Letter 46.

46-1 See response to comment 19-1.

Response to Hearing Comments

Comment H-1, Dick Posekany.

> There has been a lot of effort and discussion placed on old-growth retention for various reasons. I wonder how you would maintain any salvage, because there is going to be a lot of it in those areas and I don't think that much emphasis has been given to that.

Response:

> As discussed on page 1-13 of the DEIS, mortality salvage would occur on lands in the intensive timber base, VRM II constrained timber base and on all other lands in the event of a major catastrophic event or when beneficial to wildlife or fish. With these exceptions, salvage is not planned for old-growth retention areas. In addition, in all harvest areas some snags and decaying trees would be left where possible to provide wildlife habitat (See page 3-22).

Comment H-2, Jim Geisinger.

> The Environmental Impact Statement was prepared by the Oregon State Office of BLM and signed by the State Director. Yet the preferred alternative was selected by the District Manager. This seems to be in violation of CEQ regulations. It might provide a little more consistency in the future if the State Director were the responsible official for selecting the preferred alternative.

Response:

> Pursuant to Section 1507.3 of the CEQ Regulations, the BLM has identified the State Director as the responsible official for filing EISs with the EPA (W.O. IM 80-370). Through the planning process, the District Manager evaluates land use alternatives and develops a preferred land use alternative, which is reviewed and concurred with (or revised) by the State Director as a basis for EIS preparation. The timber management portions of the preferred land use alternative are incorporated into the EIS as the proposed action (preferred alternative).

TEXT REVISIONS

Page

1-7 Paragraph 2, first sentence. Change to: The wildlife habitat management component focuses on retaining 5,700 acres of old growth and another 6,100 acres that contain some scattered old-growth trees.

1-14 Add to the first paragraph under Planting: Hardwood species would be planted in areas harvested under the Hardwood Management Program. Commercial conifer species to be planted would consist of noble fir, western hemlock, western red cedar and Douglas-fir.

1-19 Change Water Resources, Wildlife Population and Socioeconomics data as shown in revised Table 1-5.

1-23 Move the last sentence in the fourth paragraph under State and Local Government to the end of the previous paragraph. The last two paragraphs on the page are then consolidated.

1-25 Table 1-6. Replace the discussion for goal number 5 with the following: All alternatives conserve open space and protect mineral and cultural resources. All alternatives except 1 and 2 protect scenic resources to some degree. Adverse impacts to wildlife habitat, water resources, recreation areas and similar resources are greatest under Alternative 1 and least under Alternative 5 (see revised Table 1-5).

1-25 Table 1-6. Goal number 8 discussion; add to the end of the second sentence: by the addition of developed sites, designation of recreation lands and additional areas for specific activities.

1-27 See revised Table 1-7.

2-9 After the last paragraph add: The Tillamook Bay is one of nine principal estuaries that could be affected by BLM logging activities. The Ecological Characterization of the Pacific Northwest Coastal Region (Proctor 1980) indicates the Siletz, Alsea, Nestucca and Tillamook Bays have some problems of increased temperatures and suspended solids. Of these four estuaries, the Tillamook Bay is being supplied by sediments from the Trask and Wilson Rivers and the problems in that bay are the most severe (Tillamook Bay Study 1978).

2-19 Paragraph 1, first full sentence, change wording in parentheses to: (Table 2-6, Appendices E and F).

2-20 Table 2-7. Age of mature coniferous forest should be 116-195 years.

Table 1-5 Summary of Impacts

Environmental Components Impacted	Units of Measure	Existing Situation	Proposed Action	Alt. 1 Max. Tbr.	Alt. 2 Str. Tbr.	Alt. 3 Emp. Tbr.	Alt. 4 Emp. Other	Alt. 5 Full Eco.	Alt. 6 Lo MHS	Alt. 7 Hi MHS	Alt. 8 No Herb.	Alt. 9 No ACE	Alt. 10 No Action	Remarks
Water Resources														
Sediment Yield	tons/decade	6,181	5,709	7,410	6,483	6,048	5,226	3,837	5,876	5,404	5,610	4,549	5,734	
Increased nitrogen		38	48	63	55	51	44	33	49	45	46	37	44	
Wildlife Population														
Roosevelt Elk, end of 5th decade	Percent change from existing	NA	-5	*	*	-30	-10	+40	-5	-5	-5	-5		
Roosevelt Elk, end of 10th decade	Percent change from existing	NA	+35	*	-50	No change	+50	+110	+35	+35	+35	+35	*	
N. Spotted Owl, end of 1st decade		21	10	0	0	5	6	10	10	10	10	10	0	300 acre old growth habitat minimum
N. Spotted Owl, end of 10th decade		21	18	0	0	7	11	13	18	18	18	18	0	
N. Spotted Owl, end of 1st decade		21	1	0	0	1	1	1	1	1	1	1	0	
N. Spotted Owl, end of 10th decade		21	1	0	0	0	9	10	1	1	1	1	0	1,000 acre old growth habitat minimum
Socioeconomic 1/														
Impacts Compared to Existing Condition														
Total earnings	$ thousands	32,558	+ 6,910	+17,740	+14,001	+10,598	+ 4,790	- 6,315	+ 8,478	+ 4,528	+ 6,189	- 2,315	+ 8,741	
Total employment	jobs	2,973	+ 631	+ 1,618	+ 1,277	+ 967	+ 437	- 577	+ 774	+ 412	+ 565	- 209	+ 798	
O&C payments	% levies	9.5	+ 1.3	+ 2.1	+ 1.8	+ 1.6	+ 1.2	+ 0.5	+ 1.5	+ 1.2	+ 1.3	+ 0.7	+ 1.5	
Impacts Compared to No Action Condition														
Total earnings	$ thousands	2/	- 1,832	+ 8,999	+ 5,260	+ 1,857	- 3,952	-15,055	- 262	- 4,211	- 2,560	-11,056	41,298	
Total employment	jobs	2/	- 168	+ 821	+ 479	+ 170	- 362	- 1,375	- 24	- 385	- 234	- 1,007	3,770	
O&C payments	% levies	2/	- 0.1	+ 0.6	+ 0.3	+ 0.1	- 0.3	- 1.0	- 0.0	- 0.3	- 0.2	- 0.7	16.2	

* In these alternatives, elk populations are expected to be maintained at less than 500 animals.

1/ See Chapter 3 for discussion of dual impact measures.
2/ Impacts measured from No Action Condition (Alternative 10).

+ Beneficial - Negative L Low M Medium H High

Table 1-7 Consistency of the Proposed Action and Alternatives to the Basic Objectives of the Forestry Program for Oregon 1/

Basic Objective	Proposed Action and Alternatives: Consistent	Minimally Consistent	Inconsistent	Discussion
To maintain the maximum potential commercial forest land base consistent with other resource uses while assuring environmental quality.	1	2, 3, 10	PA, 4, 5, 6, 7, 8, 9	The benchmark (218,902 acres) for consistency is the commercial forest land base minus withdrawn TPCC lands. Environmental quality would be protected to the degree specified in the Oregon Forest Practices Act. However, Alternatives 1, 2, and 10 would not meet management guidelines for certain lands as mandated by Congressional Acts and Federal Executive Orders (See Purpose and Need Section) because of impacts on fragile and reforestation problem areas, T&E species and riparian zones.
To identify and implement the levels of intensive forest management required to achieve maximum growth and harvest.	PA, 1, 2, 3, 4, 5, 6, 7, 9	8, 10		BLM currently implements a full range of intensive timber management practices (refer to Forest Management Treatments and Design Elements, this chapter) for optimization of timber production. New and improved practices would be implemented consistent with technological advances.
To maintain community stability by remaining flexible for increases in future harvest levels that would offset projected shortages.	1, 2, 3, 10	6	PA, 4, 5, 7, 8, 9	The benchmark for consistency is the current allowable cut level of 156 MM bd. ft./yr. There is no surplus inventory on the Westside Salem SYUs. Federal mandates presently prohibit deviation from even flow except where surplus inventory is identified.

1/ Arrived at through consultation with Oregon State Department of Forestry

Page

2-23 On page 2-23 of the DEIS, reference was made to 26 known locations of northern spotted owls on BLM-administered lands. These locations, or habitat units, were based on surveys in the WSS EIS area as old as 1975, some of which had not been repeated. This was the best information available at the time the DEIS was prepared. The text should be updated by adding the following after the fourth paragraph.

New intensive owl and habitat surveys began in the spring of 1981 and were just recently completed. The information revealed that substantial changes in current estimates and analysis were necessary.

Of the 26 locations known to have supported owls at some time in the last 6 years, only 21 currently have habitat that is of even marginal quality; 5 have been so altered that they will not support any owls. Of the remaining 21 locations, only 12 were occupied during 1981.

The 21 locations or habitat units were judged to be in the following condition:

Present Condition of Northern Spotted Owl Habitat Units

	Habitat Units	Occupied Habitat Units
Poor	6	3
Fair	10	5
Good	4	3
Very Good	1	1
Excellent	0	0

The criteria used to judge the condition are:

Poor = Less than 150 acres of old growth within 1,200 acres.
Fair = Less than 300 acres of old growth within 1,200 acres.
Good = In excess of 300 acres of old growth within 1,200 acres.
Very Good = In excess of 450 acres of old growth within 1,200 acres.
Excellent = In excess of 450 acres of old growth within 1,200 acres with the old growth of excellent quality in large blocks with no instrusions.

In the judgment of BLM's district biologist, those habitats in the poor and fair categories are extremely marginal and will eventually fail to support owls.

2-24 Seventh paragraph, after the first sentence, add: All or portions of five rivers (Alsea, Nestucca, Nehalem, Siletz and Trask) have been identified by the State of Oregon for potential State scenic waterway designation.

2-25 Table 2-10, add 2/ after each river listed except the Willamette. Add: Footnote 2/ River also identified by the State of Oregon for potential State scenic waterway designation.

3-7 Table 3-4, Title, change to: Changes in Sedimentation (Tons/Decade).

3-12 Second sentence. Delete "regardless of the alternative selected" and replace with: insignificant for all alternatives except 1. Under Alternative 1, wetlands would be significantly impacted by harvesting operations. This would be inconsistant with Executive Orders 11988 and 11990. Aquatic vegetation would be protected only to the degree afforded streams under the Oregon Forest Practices Act.

3-13 Add to the third paragraph: The artificial regeneration program on BLM-administered lands is not expected to significantly affect the stand or species composition of the entire North Coast Area. (BLM administers less than 8 percent of the total forested lands. Compare Appendices E and F.)

3-17 The beginning of 3rd paragraph add: Once roads are closed to use, elk use increases to near normal levels.

3-24 Add to end of fifth paragraph: Examples of those species impacted are deer, elk, American kestrel and rufous hummingbird. The degree of impact depends on the alternative chosen. Table 1-4 shows acres treated by alternative.

3-24 Following the sixth paragraph add: Other potential impacts include the coating of eggs, thereby affecting their hatchability, and the soaking of individuals, making them more susceptible to other environmental stresses. However, data are insufficient to accurately predict the impacts of diesel oil carrier on animals in the EIS area.

3-26 Fourth paragraph, next to the last sentence, change to read: Buffer strips will be maintained and no impacts on water temperatures are expected.

3-28 Because of the new data (see text revision for page 2-23), replace the first three paragraphs on page 3-28 with the following:

The Oregon Endangered Species Task Force management recommendations for each pair of owls (in effect during the preparation of the proposed MFP) called for total protection of 300 acres of old-growth core area (if available) and an additional 900 acres to be managed to provide at least 50 percent of the acreage in stands of 30+ year-old forests. Assuming that these recommendations identify minimum essential habitat, then the following table arrays by alternative the short and long-term impacts on the existing 21 habitat units and also indicates the number of new habitat units that may be created in the long term.

Future of the 21 Current Habitat Units

	PA & 6-9	1	2	3	4	5	10
Usable in short term	10	0	0	5	6	10	0
Usable in long term	18	0	0	7	11	13	0
New habitat units created over time (100+ years)	5	0	0	1	11	21	0
Long-term total	23	0	0	8	22	34	0

As this table displays, some habitat units drop out in the short term only to reappear in the long term. This is based on the assumption that habitat currently in poor or fair condition will eventually fail. However, in some alternatives, as the forest matures, they will become usable again; in other alternatives all or some habitat units disappear as no protection is offered them.

In all alternatives except 1, 2 and 10, new habitat units would be created by the various management schemes provided. While these may not show up for many years (100+), they would eventually become northern spotted owl habitat units.

A proposed revision of Task Force recommendations has resulted from recent data. The revision recommends that forests be managed to provide 1,000 acres of old growth per pair of owls within 1.5 mile radius of nest sites.

Implementation of the new recommendations in the WSSYUs would be limited by the extent of the existing old-growth forest. The following analysis of the relationship of the alternatives to spotted owl habitat is based on the assumption that the revised recommendations identify minimum essential habitat. Land use allocations in the proposed action and Alternatives 3 and 6 through 9 would provide enough habitat so that one owl pair would survive and three other pairs might exist under marginal conditions. Initially, Alternative 5 would provide for one to four pairs, although after 10 decades, habitat for 10 pairs would exist. Alternative 4 would provide for one to four pairs and nine pairs after 10 decades. Alternatives 1, 2 and 10 would not provide habitat for any owls.

3-28 Add to beginning of last paragraph: In the short term, the decrease in old-growth and mature habitats in all alternatives would have an adverse impact on wildlife.

3-28 Add to end of last paragraph: In addition, intensive forest practices would lead to even age stands of predominately Douglas-fir that would greatly reduce habitat diversity and adversely impact wildlife.

3-30 Fourth paragraph, replace with the following: The northern spotted owl is the only species listed by the State of Oregon as threatened that would be adversely impacted. The original recommendations of the Oregon Endangered Species Task Force influenced the proposed plan for the EIS area. Assuming that these recommendations identify minimum essential habitat, 10 of the 21 known habitat units in the SYUs would be fully protected under six of the alternatives, including the proposed action. Two of the alternatives would provide protection for fewer numbers and three alternatives provide no protection. A recent proposed revision of the Task Force recommendations indicates that minimum habitat requirements may be greater. If so, most alternatives would maintain only one pair. However, Alternatives 4 and 5 would eventually provide habitat for 9 or 10 pair.

3-45 Last paragraph, fourth sentence, change: $8,471,000 to $8,741,000.

3-47 Table 3-16, TILLAMOOK COUNTY, Alternative 1, Total Employment, change: +117 to +127.

3-47 Table 3-16, EIS AREA, Alternative 1, Total employment, change: + 1,540 to + 1,618.

3-48 Table 3-17, title, change to read: Short-Term Impacts Compared to No Action Condition on Local Employment and Earnings Related to Timber Harvest (Average annual amounts during first decade, earnings in thousands of 1978 dollars).

3-50 Table 3-18, title, change to read: Short-Term Impacts Compared to Existing Condition on Local Income and Employment Related to Fisheries, Hunting and Other Recreation.

3-50 Table 3-19, title, change to read: Short-Term Impacts Compared to No Action Condition on Local Income and Employment Related to Fisheries, Hunting and Other Recreation (Income in thousands of 1975 dollars).

3-54 <u>Cumulative Economic Impacts</u> section, replace the second paragraph with the following:

The Medford District's revised plans will reduce total O&C revenues and distributions by about 4.0 percent in the short term. This amounts to about $13 million when considered in terms of current timber sale values. The cumulative impact with the proposed action would amount to 4.7 percent less revenue or around $16 million. This difference would be equivalent to an average of 15 cents per $1,000 of assessed value and 0.8 percent of total levies for all O&C counties. The most severe cumulative impact would be a 10 percent less O&C revenues if Alternative 5 were adopted. The cumulative impact of Alternative 1 together with the revised changes in Medford District would be a decrease of 0.4 percent in O&C revenues.

Appendix D, Pages D-1 thru D-7. The following key should be used in conjunction with Appendix D.

Resident	Relative Abundance	Habitat
P = Permanent	A = Abundant	U = Uses
S = Summer	C = Common	O = Optimum
W = Winter	U = Uncommon	
M = Migratory	R = Rare	
B = Breeding		

G-7 After the definition of O&C Lands add: Old growth - A forest containing many large trees with large snags and numerous large, down logs. There is a multi-layered canopy of several species. Some of the older trees are beginning to show signs of decadence. Small openings are scattered throughout the forest. In western Oregon, forests begin to have old-growth characteristics at about 200 years.

G-12 Change the Timber Production Base definition to: Acres included in the calculation of the allowable cut (see Intensive Forest Management Lands).

Appendix H. Add new appendix.

Appendix I. Add new appendix.

APPENDIX H

IN REPLY REFER TO:

5400(230)

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240

MAY 14 1981

Memorandum

To: Solicitor

Through: Assistant Secretary, Land and Water Resources

From: Director, Bureau of Land Management

JUN 3 1981

Subject: Policy Statement - Multiple-Use Management of the Oregon and California Railroad Grant Lands (O&C)

The Bureau is currently updating the timber management program for the O&C lands in western Oregon. This involves classifying, inventorying, and allocating forest lands for multiple-use management. Plans are being developed for 13 Sustained Yield Units (SYU) and an environmental impact statement (EIS) prepared for each SYU. The EIS analyzes a range of land use allocations from maximum timber production to emphasis on wildlife habitat and other non-timber values.

The most recent EIS to be completed is the South Coast-Curry Timber Management Environmental Impact Statement. Comments received on this EIS have raised questions regarding the possible interpretations of the O&C Act of 1937 (50 Stat. 874; 43 U.S.C. 1181a, et seq.) in light of the numerous laws enacted during the 1970's which relate to the management of public resources, e.g., Clean Water Act, Endangered Species Act, Clean Air Act, NEPA, etc. In responding to these comments on the EIS, our Oregon State Director has indicated that the legal adequacy of our proposed multiple-use management will be addressed in the decision document for the South Coast-Curry Timber Management Plan.

Enclosed is a Policy Statement for the O&C lands that reflects the existing multiple-use policy direction of the Bureau in western Oregon. As indicated, this statement includes only policies that are involved with the multiple-use planning on the O&C lands and it is not a statement of all policies regarding these lands.

So we can keep our ongoing planning efforts on schedule, we would appreciate your prompt review and opinion of the legal adequacy of these policies.

Enclosure

Policy Statement

Major Multiple Use Considerations in the Management of the O&C Lands

I. Purpose:

The purpose of this statement is to clarify the Bureau's policy regarding the major land use allocations for multiple use management of the O&C lands in western Oregon. Policy direction is needed to structure land use decisions that are consistent with the Bureau's statutory mandates.

II. General Guidance:

A. Legislative and Executive Requirements

The primary statutory base for the management program on the O&C lands is the O&C Act of 1937 (50 Stat. 874; 43 U.S.C. 1181 a, et seq.). Under this act, lands classified as timberlands ". . . shall be managed for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformit with the principal (sic) of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flo and contributing to the economic stability of local communities and industries, and providing recreational facilities . . . ."

During the past several years, other legislation has been forthcoming and policy guidance has been issued which tend to broaden the relatively narrow management orientation provided by the O&C Act. A listing of these statutes and policy issuances most applicable to this discussion follows:

1. Legislative:

- O&C Act of 1937 (50 stat. 874; 43 U.S.C. 1181a, et seq.)
- Federal Land Policy and Management Act of 1976, 43 U.S.C. 1701 et seq.
- Coastal Zone Management Act, 16 U.S.C. 1451 et seq.
- Recreation and Public Purposes Act, 43 U.S.C. 809.
- National Environmental Policy Act of 1969, 42 U.S.C. 4321-4347.
- Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq.
- Act of July 1, 1944, 42 U.S.C. 300f (Safe Drinking Water).
- Endangered Species Act of 1973, 16 U.S.C. 1531 et seq.

- Act of September 15, 1960, 16 U.S.C. 670g (Sikes Act).

- Act of June 8, 1940, 16 U.S.C. 668, et seq. (Protection of Bald and Golden Eagles).

- Anadromous Fish Conservation Act, 16 U.S.C. 757 a et. seq.

- Fish and Wildlife Coordination Act, 16 U.S.X. 661=666c.

- Fishery Conservation and Management Act of 1976, 16 U.S.C. 1801-1802, 1811-1813, 1821-1825, 1851-1862, 1882.

- Migratory Bird Treaty Act of 1918, 16 U.S.C. 703-711.

- National Histories Preservation Act, 16 U.S.C. 470 et seq.

- Wild & Scenic Rivers Act, 16 U.S.C. 1271 et seq.

- Archaeological Resources Protection Act of 1979, 16 U.S.C. 470aa-47011.

2. Executive

- Executive Order 11514, Protection and Enhancement of Environmental Quality.

- Executive Order 11990, Protection of Wetlands.

- Executive Order 11988, Floodplain Management.

- Treaties with the Soviet Union, Japan, Mexico, and Canada relating to the protection of migratory birds and their environment.

B. Social/Economic Considerations:

Management of the O&C lands in western Oregon has a direct effect on the local and State economy. The revenues and employment generated by timber sales, conversion of timber to wood products, and the other values derived from 2.3 million acres of O&C lands provide a significant part of the local and State economy. Heavy public use associated with recreation and scenic values, and sports hunting and fishing sustains major economic values to the local economies. Anadromous fish production from cradle streams found on O&C lands supports a major commercial fishery that is of local and regional importance. Therefore, the primary thrust of the management program on the O&C lands is to provide a high-level and undiminishing output of wood under the principle of sustained yield and recognize and provide for these other needs so as to maintain the economic stability of the local communities and industries.

C. Land Classification:

All public land administered by the BLM in western Oregon is classified according to the Timber Production Capability Classification (TPCC). The TPCC is an intensive inventory process based on the land's physical and biological capacity to produce timber. Through this process forest lands are segregated into two categories: (1) Commercial Forest Lands which can be managed on a sustained yield basis (Suitable Lands), and (2) Commercial Forest Lands which cannot be managed on a sustained yield basis (Nonsuitable Lands).

D. Land Use Planning:

Land Use plans, (Management Framework Plans) as developed through the land use planning process, shall constitute the primary means for carrying out legislative mandates and Bureau policies. These plans shall set forth approved land uses along with the allocation of the resources thereon and serve as the framework for development and implementation of all resource plans, programs, and activities.

III. Multiple Use Policies:

A. Multiple Use Orientation

Lands classified as nonsuitable for timber production on a sustainable basis will be used to the fullest extent possible to meet nontimber needs. Where nonsuitable lands are inadequate to accommodate authorized nontimber needs, suitable lands will be substituted where a reduced level of timber production will serve with nontimber needs. Only when authorized nontimber needs cannot be met by a combination of the above will suitable lands be excluded from timber harvest.

B. Specific Resource Objectives and Policies

1. Timber Production:

a. Objective: Maximimize timber production through the highest level of management consistent with economic and environmental feasibility.

b. Policy:

1) The allowable cut shall be based on only those lands which have the capacity for providing a sustained yield of timber. Timber volume generated by experimental harvest on lands thought to be nonsuitable, if any will be in addition to the allowable cut.

2) The allowable cut shall be based on a nondeclining harvest level over time. However, temporary increases over the nondeclining harvest level may be permitted as long as they do not exceed the long-term sustained yield capacity of the land. Temporary increases over the nondeclining harvest level will be permitted only if prescribed criteria are met. These criteria are: (1) early attainment of a regulated forest growing at its long-term sustained yield capacity; (2) reduction in mortality and accompanying timber volume loss; (3) minimizing any projected timber supply shortages; (4) minimizing the impacts of any future decrease in the current allowable cut; and (5) does not result in a subsequent future decrease below the nondeclining harvest level unless unusual and extenuating circumstances exist.

3) Silvicultural practices, including, but not limited to, site preparation, planting of genetically superior stock, brush control, precommercial thinning, fertilization, commercial thinning, and stand conversion, shall be carried out on forest lands suitable for intensive timber management, based on their technical, economical, and environmental feasibility.

2. Water Quality:

a. Objective: Maintain water quality at Federal and State standards.

b. Policy: Take mitigating measures to provide a high probability that water quality standards will be maintained. Limit or exclude timber harvesting only in areas where mitigating measures will not maintain water quality standards.

3. Wetlands: (Including riparian zones)

a. Objective: Protection of wetlands including riparian zones.

b. Policy: Take mitigating measures to protect wetlands. Limit or exclude timber harvesting only in areas where mitigating measures will not be effective.

4. Threatened or Endangered Species

a. Federal Listed Species

1) Objective: Maintain specifically identified habitat for individuals of all species on the Federal threatened or endangered list.

2) Policy: Maintenance of a minimal amount of suitable habitat, including the old-growth component, in order to maintain viable populations of threatened or endangered species. This includes limiting or excluding timber harvesting to meet these requirements.

b. State Listed Species:

1) Objective: Provide adequate protection for fish and wildlife considered to be threatened, rare, or endangered by the State agency.

2) Policy: Through cooperative agreements with the State agencies, plan, develop, maintain, and coordinate programs to provide adequate protection for fish and wildlife considered to be threatened, rare, or endangered by the State agency. Such conservation and rehabilitation shall include, but not be limited to, specific habitat improvement projects and related activities.

Limit or exclude timber harvesting on suitable lands when nonsuitable lands or mitigating measures do not provide adequate protection.

5. Habitat Management

a. Objective: Conservation and rehabilitation of wildlife, fish, and game.

b. Policy: Through cooperative agreements with the State agencies, plan, develop, maintain, and coordinate programs for the conservation and rehabilitation of wildlife, fish, and game.

Such conservation and rehabilitation shall include, but not be limited to, specific habitat improvement projects and related activities. Limit or exclude timber harvesting on suitable lands when nonsuitable lands or mitigating measures do not provide for adequate conservation or rehabilitation.

6. Recreational Areas

a. Objective: Protection of potential and developed high-value recreational areas which includes the visual quality of significant scenic areas identified through the Bureau's planning system.

b. Policy: Take mitigating measures to protect potential and developed high-value recreation areas which includes the visual quality of significant scenic areas. Limit or exclude timber harvesting where mitigating measures will not be effective.

APPENDIX I

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SOLICITOR
WASHINGTON, D.C. 20240

SEP 08 1981

Memorandum

To: Director, Bureau of Land Management

From: Solicitor Jean Kingsley for Solicitor

Subject: Review of BLM Policy Statement for Multiple Use Management of the Oregon and California Railroad and Coos Bay Wagon Road Revested Lands (O&C Lands)

This responds to your May 14, 1981, memorandum requesting our opinion on the legal adequacy of the Bureau's proposed multiple use management policy for the O&C lands in western Oregon. The proposed multiple use policy encompasses six management objectives which are: timber production, water quality, wetlands, threatened and endangered species, habitat diversity, and recreational areas. Based on our review of the Act of August 28, 1937 (O&C Act), 50 Stat. 874, 43 U.S.C. 1181a et seq., its legislative history and subsequent legislation, we have concluded that the O&C Act places forest production in the dominant role within the entire scheme of the Bureau's management of the O&C lands. Further, the Act clearly does not mandate exclusive use, but instead requires management for other interests as well as timber supply. Therefore, the Bureau must see that its operations meld the dominant use of forest production with those aspects of multiple use envisioned by the O&C Act in addition to any relevant requirements specified in subsequent legislation. Thus, to the extent the Bureau's proposed policy, or portions thereof, fulfills this function, then it meets the test for legal sufficiency.

This memorandum will serve an additional function. In response to prior requests by the Bureau and the Department, the Solicitor's Office has examined various aspects of the management of the O&C lands.1/ This paper will undertake to enunciate a clear interpretation of management authorized under the O&C Act. This opinion confirms the conclusion reached in the August 27, 1979, memorandum to the Director, BLM, from the Associate Solicitor, Energy and Resources, approved by the Solicitor, on "Technical Revisions of Earlier Opinions Concerning Bureau Management of O&C Lands." The August 27 memorandum recognizes that commercial forestry is only one of the components for which the timber on the O&C lands is to be managed. " . . . [P]ermanent forest production is to be maintained for various purposes which include, inter alia, recreation. Accordingly, there is no basis to conclude that recreation is always subordinate to the other purposes mentioned in the O&C Act as a matter of law."

1/ a. Memorandum to the Director, BLM, from the Deputy Solicitor on "Applicability of Section 603 of the Federal Land Policy and Management Act of 1976 to the O&C and Coos Bay Wagon Road Lands," June 1, 1977.

b. Memorandum to the Secretary from the Solicitor on "BLM Wilderness Review--Sec. 603, Federal Land Policy and Management Act." September 5, 1978. M36910. 86 I.D. 91, 97-99.

c. Memorandum to the Director, BLM, from the Associate Solicitor, Energy and Resources, on "Legality of Deviating from Even Flow Policy in the Josephine Sustained Yield Unit," January 24, 1979.

d. Memorandum to the Director, BLM, from the Associate Solicitor, Energy and Resources, on "Technical Revisions of Earlier Opinions Concerning Bureau Management of O&C Lands," August 27, 1979.

e. Memorandum to the Director, BLM, from the Assistant Solicitor, Realty, on "Exchange of Oregon and California and Coos Bay Wagon Road Grant Lands under FLPMA," October 9, 1980.

DISCUSSION

Section 1 of the O&C Act requires the Department of the Interior to manage the O&C lands for "permanent forest production." As the chief component of forest production, the timber is to be sold, cut and removed in conformity with the principles of sustained yield so as not only to provide a permanent source of timber supply, but also to protect watershed, to regulate stream flow, to contribute to the economic stability of local communities and industries and to provide recreation. The relevant portions of Section 1 of the O&C Act are:

> . . . such portions of the revested Oregon and California Railroad and reconveyed Coos Bay Wagon Road grant lands as are or may hereafter come under the jurisdiction of the Department of the Interior, which have heretofore or may hereafter be classified as timberlands, and power-site lands valuable for timber, shall be managed, . . . for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal [sic] of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilties [sic]. . . . (43 U.S.C. § 1181a).

It is clear not only from the language of the Act itself, but also from the legislative history that the O&C legislation is a conservation measure requiring a form of multiple use management. The Department of the Interior drafted H.R. 7618, the bill which ultimately became the O&C Act. When transmitting the draft legislation, Acting Interior Secretary Charles West noted that the laws under which the O&C lands were being administered[2/] aimed at rapidly selling the timber and disposing of the lands for agricultural purposes. He went on to say:

2/ Acts of June 9, 1916 (39 Stat. 218) and February 26, 1919 (40 Stat. 1179), as amended.

> My purpose in submitting these amendments is to stop this waste and destruction, by providing necessary authority for the sale of the timber and the use of the land, in conformity with generally recognized principles of conservation. Proper protection of the interest of the communities, the State and the Government requires a long-range program of planning, having for its object a well-regulated system of cutting, based upon the kind, character, and suitability of the timber, rather than upon the actual presence on a given subdivision of a fixed amount of merchantable timber. The amendments will make possible also the reservation of cut-over land, timbered tracts, or an acreage of seed trees, when deemed necessary, as a conservation measure, in aid of reforestation, stream-flow protection, recreational use, or other public purposes. [Emphasis added.] Senate Report No. 1231, 75th Cong., 1st Sess., 3-4 (August 16, 1937).

The House and Senate Reports accompanying H.R. 7618 reiterated the points made by Acting Secretary West. In the explanatory statement for Title I the Report of the Senate Committee on Public Lands and Surveys said:

> The purpose of title I, which comprises the first five sections, is to provide conservation and scientific management beyond liquidation of timber assets and protection from fire. . . . All land classified as timber in character will continue in Federal ownership and be managed for permanent forest production on what is commonly known as a sustained-yield basis. Under such a plan the amount of timber which may be cut is limited to a volume not exceeding new growth, thereby avoiding depletion of the forest capital. This type of management will make for a more permanent type of community, contributing to the economic stability of local dependent industries, protect watersheds, and aid in regulating streamflow. Senate Report No. 1231, 75th Cong., 1st Sess., 2 (August 16, 1937).3/

3/ *See also*, House Report No. 1119, 75th Cong., 1st Sess., 2 (June 28, 1937).

As envisioned by Acting Secretary West, H.R. 7618 gave the Department the authority to manage the timber in conformity with recognized principles of conservation and allowed it to reserve tracts of land when deemed necessary for the purposes of reforestation, stream-flow protection, recreational uses or other public purposes. The legislation as adopted provides this degree of flexibility in management. It gives the Department sufficient authority to administer the O&C lands for the dominant use of forest production in order to achieve those aspects of multiple use management referenced in the O&C Act.

Since passage of the O&C Act, numerous laws have been enacted which affect the Bureau's management authority of the public lands. The principal laws are cited in the Bureau's draft multiple use policy. Because most of these laws do not explicitly exempt management of the O&C lands from their coverage, they can require the BLM to take actions which may in fact conflict with the purposes of the O&C Act, e.g., Endangered Species Act Amendments of 1978, 16 U.S.C. 1531 et seq.; Clean Water Act of 1977, as amended, 33 U.S.C. 1251 et seq. However, this relationship is not applicable in the case of the Federal Land Policy & Management Act of 1976 (FLPMA), 43 U.S.C. 1701 et seq. FLPMA does not affect the Bureau's management of the O&C lands to the same degree as it affects the Bureau's general administration of the public lands.

FLPMA has been described as the organic act for the Bureau. Nevertheless, its effects over lands administered by the BLM are not universally felt, most especially in the case of the management of the O&C lands. Key provisions make it clear that the Bureau's authority under FLPMA may be limited by other provisions of law.

For example, in the Act's statement of policy Congress declared that:

> . . . goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law. . . . [Emphasis added.] 43 U.S.C. § 1701(a)(7).

Section 301(a) defines the responsibilities of the Director, BLM:

> He shall carry out such functions and shall perform such duties as the Secretary may prescribe with respect to the management of lands and resources under his jurisdiction according to the applicable provisions of this Act and any other applicable law. [Emphasis added.] 43 U.S.C. § 1731(a).

Section 302(a) limits BLM's application of the principles of multiple use and sustained yield:

> The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him . . . except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law. [Emphasis added.] 43 U.S.C. § 1732(a).

And Section 701(b) defines the effect that the O&C Act has on management under FLPMA:

> Notwithstanding any provision of this Act, in the event of conflict with or inconsistency between this Act and the Acts of August 28, 1937 (50 Stat. 874; 43 U.S.C. 1181a-1181j), and May 24, 1939 (53 Stat. 753), insofar as they relate to management of timber resources, and disposition of revenues from lands and resources, the latter Acts shall prevail. 43 U.S.C. § 1701 note.

As the language quoted above makes clear, Congress deliberately made provision for a different manner of administering the O&C lands.

Because the O&C Act is a dominant use statute, the broad multiple use management approach provided for in FLPMA may conflict with the more restrictive management approach outlined in the 1937 Act. In FLPMA the concept of multiple use, as defined at Section 103(c), 43 U.S.C. § 1702(c), gives the BLM great flexibility in determining where, how, to what degree of intensity and for what objectives various natural resources are to be managed. By contrast, the O&C Act specifies that the O&C lands are to be managed for permanent forest production. Yet this resource is to be maintained for various purposes (i.e., permanent source of timber supply, watershed, stream flow, economic stability and recreational facilities). It falls to the BLM to determine the best way to achieve each of these goals.

The Bureau's proposed policy statement lists six resource objectives. The first involves timber production with the goal of maximizing production consistent with economic and environmental feasibility. The policy to achieve this goal would limit calculation of the allowable cut to lands which have the capacity to provide a sustained yield of timber. As was related above, the O&C Act is a conservation measure authorizing the Bureau to use scientific methods when managing the total resource. Furthermore, the Act itself specifies that the timber produced on the O&C lands is to be harvested in conformity with the principle of sustained yield.

The second objective is to maintain water quality at federal and state standards. Authority for achieving this goal may be found in the Clean Water Act of 1977, as amended, 33 U.S.C. 1251 et seq. Under the Clean Water Act, also known as the Federal Water Pollution Control Act (FWPCA), states may assume the responsibility for administering a pollutant discharge elimination permit system. 33 U.S.C. § 1342(b). Once a state's permit system is approved by the Environmental Protection Agency, then individuals operating federal programs must comply with the requirements of the state's permit program. See 33 U.S.C. §§ 1311 and 1362(5). Thus, to the extent that the BLM's policy for water quality meets Clean Water Act requirements, it also fulfills its O&C Act obligations.

The third objective is to protect wetlands including riparian zones in accordance with Executive Orders 11988 and 11990. In addition to the Executive Orders cited above, support for protection of wetlands on the O&C lands is found in the O&C Act itself and the Clean Water Act. As has been described above, the O&C Act is a conservation measure. The timber produced is to be managed in such a way as to protect watersheds and regulate stream flow. Protection of wetlands aids in achieving such goals. Even if specific protection of wetlands had not been envisioned at the time of the Act's passage, it is clear from the legislative history that Congress intended the O&C lands to be managed in accordance with scientific principles of conservation.4/ General sensitivity to the value of wetlands has developed relatively recently. In managing the O&C lands, the Bureau is obligated to incorporate the best conservation techniques for preservation of the resource. In addition, wetlands are included within the coverage of the Clean Water Act. In United States v. Weisman, 489 F. Supp. 1331, 1337-1338 (1980), the court said:

4/ See the quotations above of Acting Interior Secretary Charles West and Senate Report No. 1231, 75th Cong., 1st Sess., 2 (August 16, 1937).

> Congress fully intended that the waters subject to regulatory control of the United States under the FWPCA be given the "broadest possible Constitutional interpretation." [citations deleted.] The scope is not limited to the traditional tests of navigability, but rather is defined in Section 502, FWPCA, 33 U.S.C. § 1362(7), which defines "navigable waters" under the FWPCA as "waters of the United States, including the territorial seas." [citations deleted]. . . . It is therefore clear that Congress intended to protect the waters of the United States in a plenary, geographic sense, and that wetlands are specifically included within that protection.

The fourth objective has two aims, the first of which is to maintain specifically identified habitat for species appearing on the federal threatened or endangered species list. Authorization to pursue this goal may be found in the Endangered Species Act Amendments of 1978 (Endangered Species Act), 16 U.S.C. 1531 et seq., which requires federal agencies to use their authorities in furtherance of the purposes of that Act for the conservation of federally listed endangered and threatened species and their critical habitat. 16 U.S.C. § 1536 (1978).5/ Because compliance with the Endangered Species Act can result in direct conflicts with the goals of the O&C Act, the Bureau's policy for achieving its federal endangered species objectives should focus on the particular needs of the listed species making every effort to overlap the goals of the two statutes whenever possible.

The Bureau's fourth O&C management objective also looks to provide special mitigating measures for state listed threatened and endangered species. The foundation underpinning this exercise of authority is found in the 1974 amendment to the Sikes Act, P.L. 86-797, 74 Stat. 1052, 16 U.S.C. 670a et seq. The Sikes Act Amendment, P.L. 93-452, 88 Stat. 1369, 16 U.S.C. 670g et seq., requires the Secretary of the Interior, in cooperation with states, to develop and maintain programs for the conservation

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5/ The Endangered Species Act provides for an exemption mechanism. See 16 U.S.C. § 1536 (1978).

and rehabilitation of wildlife, fish and game on the public lands. 6/ The principal method of implementing these wildlife conservation and rehabilitation programs is through cooperative agreements with the states. Any agreements thus entered into must provide, among other things, adequate protection not only for the fish and wildlife classified on the federal endangered species list but also those species "considered to be threatened, rare, or endangered by the State agency." 16 U.S.C. § 670h(c)(3)(D). Thus, to the extent the Bureau and the responsible state agency mutually determine the adequate amount of protection needed for federal and state listed species, then the Bureau's policy for the management of the O&C lands must reflect this additional responsibility.

While the O&C lands come within the coverage of the Sikes Act Amendment, it is important to note that its drafters did not intend for fish and wildlife programs under the Act to "constitute a dominant use on public land areas to the exclusion of other appropriate uses." Senate Report No. 93-934, 93rd Cong., 2d Sess., 8 (June 14, 1974). Rather, one of the main purposes of the Sikes Act Amendment, as expressed by Congressman John D. Dingell during House floor debates on H.R. 11537, was to give the states an expanded role in the management of wildlife on the public lands. Congressman Dingell said:

> This is a comprehensive planning package in which the States will be ultimately involved. It is an attempt to finally resolve this ancient battle which has existed between the States and the Federal Government of game management on public lands. 120 Cong. Rec. 383 (January 22, 1974)

Because the O&C Act and the Sikes Act Amendment concern the same general subject matter, the management of resources on the public lands, statutory construction requires that effect should be given to both if possible. Rawls v. U.S., 331 F.2d 21 (1964);

6/ "Public lands" is defined in the Sikes Act Amendment as "all lands under the respective jurisdiction of the Secretary of the Interior. . . except land which is, or hereafter may be, within or designated as (A) a military reservation; (B) a unit of the National Park System; (C) an area within the national wildlife refuge system; (D) an Indian reservation; or (E) an area within an Indian reservation or land held in trust by the United States for an Indian or Indian tribe." 16 U.S.C. § 670k(4).

Anderson-Tully, Co. v. Murphree, 153 F.2d 874 (1946); In re Markel, 195 F.Supp. 926 (1961). In order to achieve the most complementary effect between these two laws, when developing cooperative agreements with the states, the Bureau must see how wildlife protection goals can best be achieved on lands not available for timber production. In the case of those areas of land where direct conflict in use will occur, the Bureau may choose one use over the other, provided it has analyzed its choice in the context of the principal goals of each Act and is satisfied that the particular choice has not significantly encroached upon the overall effect of those goals.

The fifth BLM proposed management objective for the O&C lands is to maintain habitat diversity. We believe to the extent that maintaining habitat diversity will promote the achievement of any targets specified in the O&C Act or other authorizing laws, for example, habitat management under the Sikes Act Amendment, 16 U.S.C. § 670k(6), or to the extent such practices would not be inconsistent with those targets, then the Bureau has authority to manage for such an objective. 7/

The last management objective is to protect potential and developed high-value recreational areas which includes the visual quality of signficant scenic areas identified through the Bureau's planning process. Because providing recreational facilities is one of the goals of the O&C Act, the BLM has the authority to manage for this purpose even if to do so were to come in conflict with managing for timber production. Additionally, we believe that the term "recreational facilties [sic]" appearing at 43 U.S.C. § 1181a is broad enough to include such things as scenic highways or scenic rivers which are identified as such through the Bureau's planning process.

7/ See Solicitor's Opinion M36910 on "BLM Wilderness Review--Sec. 603, Federal Land Policy and Management Act" which advances a similar position for the extent of wilderness review which is authorized on the O&C lands. "Congress has recognized . . . that some O&C lands might be unsuitable for timber production. Sec. 701(b) of FLPMA requires the wilderness review provisions of FLPMA to yield only to the extent they are inconsistent with the management of permanent forest production provided for in the O&C Act." 86 I.D. 91, 98.

CONCLUSION

Our review of the draft policy statement for management of the O&C lands indicates that only minor modifications are necessary to bring it into line with this legal analysis. As was stated earlier in this memorandum, the Bureau has the responsibility to see that its operations bring together the dominant use of forest production with those aspects of multiple use envisioned by the O&C Act in addition to any relevant requirements specified in subsequent legislation. We believe that the Bureau has struck this balance in much of its proposed policy.

In summary, while the O&C Act limits the Bureau's management options on the O&C lands, nevertheless, it provides the Bureau, to a certain degree, with a significant amount of discretion to determine how competing objectives will be met. Therefore, as the Bureau continues to develop its overall policy for managing the O&C lands, it will need to evaluate its options on a case-by-case basis in the context of the O&C Act as well as any other relevant legislation.

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